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Apr 26 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Robert E. Hood., Circuit Court Judge
Case No. 2018-CP-26-06033

Appellate Case No. 2022-000031

Royal Garden Resort Regime Homeowners Association, Inc.. Respondent

vs.

Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson;
and Phoenix of the Strand, Inc..... Appellants

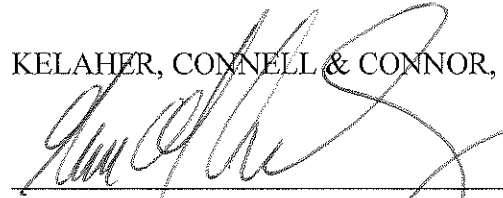
**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS'
INITIAL BRIEF AND DESIGNATION OF MATTER**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Respondent, moves this Court for an Order extending the time to file Respondents' Initial Brief and Designation of Matter currently due on April 27, 2022 in the captioned case. The basis of this motion is that Plaintiff's counsel has multiple conflicts with hearings, trials and is currently working on another appeal in the Supreme Court which includes a voluminous record.

WHEREFORE, Respondents' counsel respectfully requests this Court issue its Order granting Respondents an extension to May 27, 2022 to file Respondents' Initial Brief and Designation of Matter. This is Respondents' first request for extension in this matter.

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.A.



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April 26, 2022
Surfside Beach, South Carolina

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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of Respondent's Motion for Extension of Time File Respondent's Initial Brief and Designation of Matter on the 26th day of April, 2022, via email and by depositing a copy of same in the United States Mail, postage prepaid, to:

DZayicek@bellamylaw.com
hlusk@bellamylaw.com
Douglas M. Zayicek, Esquire
Holly M. Lusk, Esquire
Bellamy, Rutenberg, Copeland, Epps,
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Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 26th day of April, 2022.

Ray C. Bent
Notary Public for South Carolina
My Commission Expires: 1-22-29

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April 26, 2022

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Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appellate Case No. 2022-000031
Royal Garden Resort Regime Homeowners Association, Inc. v. Sea Breeze Property Management & Contract Services, Inc.; Calvin Donaldson; and Phoenix of the Strand, Inc.
C/A No. 2018-CP-26-06033
Our File No. 2018-0334C

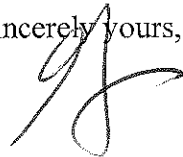
Dear Ms. Kitchings:

Enclosed please find Respondents' Motion for Extension of Time to File Respondents' Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. Our check for the \$50.00 filing fee is being mailed this date.

By copy of this letter, we hereby serve Respondents' Motion for Extension on counsel of record.

Should you have any question or need anything further at this time, please do not hesitate to contact me.

Sincerely yours,



Gene M. Connell, Jr.

GMCJr:sm
Enclosures

cc: Douglas M. Zayicek, Esquire
Holly M. Lusk, Esquire
Kirby D. Shealy III, Esquire
Luke M. Allen, Esquire