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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable Marvin H. Dukes, III, Master In Equity and Special Circuit Court Judge

APPELLATE CASE NO.: 2022-000475

Coffin Point Plantation Homeowners Association, Inc.

Appellants,

vs.

The State of South Carolina, Estate of Charles H. Lyman, The St. Helena Company, Its Successors or Assigns, The Estate of J.D. Cameron a/k/a J. Donald Cameron, The Estate of J.E. McTeer, Wilma Clark, Jeanine Skok, Lawrence Casler, Dean Morrissey, Carol Morrissey, Ralph Netherland, Gloria Netherland, Special Trust of William B. Fahrner, Mark Heles, Beverly Heles, David Smith, Lynn Smith, LiLi, LLC, Revocable Living Trust of Thomas Walterhoefer, Ceclily Deegan McMillan, Steven Teets, Lucinda Teets, Beverly Boulware, Russell Waldon, Nicolette Waldon, David Shaffer, Delora Cook, Gerald Hartwig, Carol Hartwig, Paulette Brown, Benjamin Couch, Thomas S. Clark Family Living Trust, Euniceteen Diggs, Janet Kathleen Reynolds Trust, Slade Family Revocable Trust, David C. Strother, Andrew Seward, Ashley Heath Madilon, Arnold Hollis, Lillian Hollis, Jennifer Allen, Zia As Exchange Company, LLC, Qualified Intermediary for Barbara J. Bailey Limited Partnership, Travis Washington, Janet Embly, Trustee and Individually, William S. Embly, Trustee and Individually, Scott Simmons Omari Trust, Mary Hudson, Rachelle Carolynne Owens Revocable Trust, Gerald Hartwig, Carol Hartwig, Gerald L. Wayne, Vivian M. Wayne, Lorrie Gaskin Germann, Grant Martin Germann, Gregory J. Giardina, Melissa Basenburg, Mark M. Hazard, Micah L. Myers, Jennifer J. Myers, John Joseph Edwards, Nancy Jean Edwards, Preston Ventures, LLC, Donald Lunardini, Kristina Barbara Moore Lunardini, Melissa Uhlman Revocable Trust and All Other Persons Known or Unknown Having Any Interest, Title, Estate or Interest In Or Lien Upon the Real Property Described in the

Complaint Herein Through the Above Defendants or Any Other Source Being Designated Collectively As John Doe and Mary Roe Including All Persons Who May Be Deceased, Minors, Persons in the Armed Forces of the United States of America, Insane or Incompetent Persons, and All Other Persons Under Any Other Disability Who Might Have or Claim to Have Any Right, Title or Interest in or Lien Upon the Real Property Described in the Complaint.

Respondents.

APPELLANT'S MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD ON APPEAL

The Appellant would respectfully request an extension of time within which to file the Initial Brief and Designation of Matter to be Included in Record on Appeal. The Brief and Designation of Matter are due to be filed no later than May 13, 2022. The Appellant would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice and would not prejudice the Respondents.

It is accordingly respectfully requested that the Appellant be granted until June 15, 2022 to file the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

MOSS & KUHN, P.A.

By: 

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May 11, 2022

Attorneys for Appellant

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable Marvin H. Dukes, III, Master In Equity and Special Circuit Court Judge

APPELLATE CASE NO.: 2022-000475

Coffin Point Plantation Homeowners Association, Inc.,

Appellant

v.

State of South Carolina

Respondents.

CERTIFICATE OF SERVICE

The undersigned certifies that the **Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in Record on Appeal** to which this certificate is affixed, was served upon the parties to this action by depositing a copy of the same, enclosed in a first class, postpaid wrapper properly addressed to the following:

Alan Wilson, Attorney General
Robert D. Cook, Solicitor General
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Nexsen Pruet, LLC
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Ralph V. Baldwin, Jr., Esquire
Post Office Box 238
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*Guardian ad Litem for The Estate of J.D. Cameron a/k/a J. Donald Cameron,
The Estate of J. E. McTeer and All Other Parties Known or Unknown Having
Any Interest, Title, Estate or Interest In or Lien Upon the Real Property Described
Complaint*

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Janet Embly Trustee and Individually
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in a post office or official depository under the exclusive care and custody of the United States

Postal Service on May 12, 2022.

MOSS & KUHN, P.A.

By: 
Sue Radford

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ATTORNEYS AT LAW

JAMES H. MOSS
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H. FRED KUHN, JR.
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May 12, 2022

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

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RE: Coffin Point Plantation Homeowners Association, Inc. v. The State of South Carolina, et al.
Appellate Case No.: 2022-000475

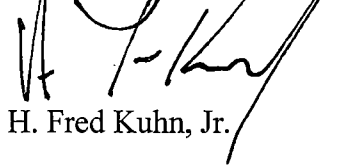
Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Notice of Motion and Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal and Certificate of Service regarding the above-referenced matter along with my firm's check in the amount of \$50.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope.

With kindest regards, I am

Very truly yours,

MOSS & KUHN, P.A.





H. Fred Kuhn, Jr.

HFKjr:sr

Enclosures

cc: Alan Wilson, Attorney General
Robert D. Cook, Solicitor General
Mary D. Shahid, Esquire
Angelica M. Colwell, Esquire
Ralph V. Baldwin, Esquire
Scot F. Hersh
Wilma Clark
Lawrence Casler
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H. Fred Kuhn, Esquire MOSS & KUHN, P.A. PO Drawer 507 BEAUFORT SC 29901		
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