

TOBIAS G. WARD, JR., PA  
— ATTORNEYS AT LAW —

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May 23, 2022

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

**RECEIVED**

**May 23 2022**

**SC Court of Appeals**

RE: MAC Coastal Properties, Inc. v. Shoestring Retreat, LLC  
Appellate Case No. 2022-000545

Dear Ms. Kitchings:

I represent the Appellant-Respondent, MAC Coastal Properties, Inc. I respectfully request an additional 30 days to file the Appellant Respondents' initial brief and designation of matter which otherwise is due this Thursday, May 26, 2022. This is the first request by Appellant-Respondent for an extension.

The grounds for this motion are that counsel for Appellant-Respondent has a very heavy caseload and needs more time to finish drafting and editing the initial brief and finish finalizing the items to include in the designation of matter. This is a complex matter, being tried over two full days with in excess of 400 pages of transcripts, 75 exhibits, and with the final order being appealed by both parties resulting in a 18 page final order. An additional 30 days will allow counsel time to finish drafting and editing these documents.

If the extension is granted, then Appellant-Respondent's initial brief and designation of matter would now be due on June 27, 2022. I will send a courier with the \$50.00 filing fee. I consulted with Respondent-Appellant's counsel, who replied he would confer with his client, but I have not yet received a response.

Respectfully,

TOBIAS G. WARD, JR. PA

  
J. Derrick Jackson

cc: Bruce Wallace, Esq., Attorney for Respondent-Appellant (via email only)  
Mary Shadid, Esq. Attorney for Respondent-Appellant (via email only)