



THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Appellate Case No.: 2022-000592

Pamela Holliday Wallin; Mark Bennett Holliday; Kingsley K. Holliday; Sara Jane Holliday; and John C. Holliday Appellants,

vs.

Ross Samuel Holliday as Personal Representative of the Estate of Warren Phillip Holliday; Ross Samuel Holliday, individually, Warren Lea Holliday, individually; 2233 Highway 17 North, LLC; 2237 Highway 17 North, LLC; 2805 Highway 17 North, LLC; 1606 Meeting Street, LLC; Bacons Bridge Road, LLC; 4687 Franchise Street, LLC; Zeezrom Properties, LLC; John Doe Leased Vehicle; 1905 North Main Street, Summerville, LLC; 815 Folly Road, LLC; 832 Coleman Blvd., LLC; 2189 Discher Avenue, LLC; New Space Science, LLC; Pirates Plunder, LLC; Sawgrass Technologies, Inc.; Holliday Amusement Company, Inc.; and The Revocable Trust Agreement between Warren P. Holliday as Settlor and as Trustee Respondents.

**RESPONDENTS’ SECOND MOTION FOR EXTENSION OF TIME TO FILE AND
SERVE INITIAL BRIEF AND DESIGNATION OF MATTER**

Respondents hereby move for an order extending the deadline to file and serve their Initial Brief and Designation of Matter. The current deadline for Respondents’ Initial Brief and Designation of Matter is November 7, 2022. Respondents request a ten (10) day extension of time to file their Initial Brief and Designation of Matter. The new deadline would be November 17, 2022.

The grounds for this motion are that Defendants’ counsel, Alice Paylor, is dealing with personal issues, which will affect her ability to file these pleadings. In order to have time to adequately prepare and file Respondents’ Initial Brief and Designation of Matter, Respondents

request that they be granted until November 17, 2022, to file and serve Respondents' Initial Brief and Designation of Matter.

Counsel for Respondents notified Appellants' counsel of their request for this extension and no objections were made.

SAXTON & STUMP, LLC

s/ Alice F. Paylor

Alice F. Paylor (SC #4380)

Bijan Ghom (SC #103531)

151 Meeting Street, Suite 350

Charleston, SC 29401

(843) 414-5080 (o)

afp@saxtonstump.com

bkg@saxtonstump.com

Attorneys for Respondents

Charleston, South Carolina
November 1, 2022

RECEIVED

Nov 01 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Appellate Case No.: 2022-000592

Pamela Holliday Wallin; Mark Bennett Holliday; Kingsley K. Holliday; Sara Jane Holliday; and John C. Holliday Appellants,

vs.

Ross Samuel Holliday as Personal Representative of the Estate of Warren Phillip Holliday; Ross Samuel Holliday, individually, Warren Lea Holliday, individually; 2233 Highway 17 North, LLC; 2237 Highway 17 North, LLC; 2805 Highway 17 North, LLC; 1606 Meeting Street, LLC; Bacons Bridge Road, LLC; 4687 Franchise Street, LLC; Zeezrom Properties, LLC; John Doe Leased Vehicle; 1905 North Main Street, Summerville, LLC; 815 Folly Road, LLC; 832 Coleman Blvd., LLC; 2189 Discher Avenue, LLC; New Space Science, LLC; Pirates Plunder, LLC; Sawgrass Technologies, Inc.; Holliday Amusement Company, Inc.; and The Revocable Trust Agreement between Warren P. Holliday as Settlor and as Trustee Respondents.

PROOF OF SERVICE

I do hereby certify that on November 1, 2022, I have served all counsel in this action with a copy of the *Respondents' Second Motion for Extension of Time to File Initial Brief and Designation of Matter* via email to the following email addresses:

Michael A. Timbes, Esquire
Thomas J. Rode, Esquire
Sarah D. Baum, Esquire
Thurmond Kirchner & Timbes, P.A.
15 Middle Atlantic Wharf
Charleston, SC 29401
michael@tktlawyers.com

Brent S. Halversen, Esquire
Halversen & Halversen, LLC
751 Johnnie Dodds Blvd., Suite 200
Mt. Pleasant, SC 29464
brent@halversenlaw.com

Daniel S. Slotchiver, Esquire
Stephen M. Slotchiver, Esquire
Slotchiver & Slotchiver, LLP
751 Johnnie Dodds Blvd., Suite 100
Mt. Pleasant, SC 29464
dan@slotchiverlaw.com
steve@slotchiverlaw.com

Attorney for Appellants

s/ Taylor Davis
Taylor Davis, Paralegal
Saxton & Stump, LLC
151 Meeting Street, Suite 350
Charleston, SC 29401
(843) 414-5080 (o)

SAXTON & STUMP
LAWYERS AND CONSULTANTS

151 Meeting Street, Suite 350 • Charleston, SC 29401
P: (843) 414-5080 • F: (843) 580-8303

RECEIVED

Nov 01 2022

SC Court of Appeals

Direct Dial: (843) 278-0114
Email: tnd@saxtonstump.com

November 1, 2022

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

*Re: Pamela Holliday Wallin, et al. v. Ross Samuel Holliday as Personal
Representative of the Estate of Warren Phillip Holliday, et al.
Appellate Case No.: 2022-000592*

Dear Ms. Kitchings:

Please find enclosed a check in the amount of \$50.00, to cover the filing fee for Respondents' Second Motion for Extension of Time to file Initial Brief and Designation of Matter in connection with the above referenced matter. Also enclosed is a copy of the motion, which has been e-filed.

Should you have any questions or concerns, please do not hesitate to contact us. Thank you for your assistance with this matter.

Sincerely,

s/ Taylor Davis

Taylor Davis
Paralegal
SAXTON & STUMP

/tnd

Enclosures

cc (via email only): Michael A. Timbes, Esquire
Thomas J. Rode, Esquire
Sara D. Baum, Esquire
Brent S. Halversen, Esquire
Daniel S. Slotchiver, Esquire
Stephen M. Slotchiver, Esquire