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**Feb 23 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

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Appellate Case No. 2022-001587

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315 Corley CW LLC; 368 Mount Pelia LLC; Bridge Charleston Investments B LLC; Bridge Charleston Investments C LLC; Bridge Charleston Investments E LLC; Bridge Charleston Investments H LLC; Anne Bosler and Dylan Hart as Trustees of the Bosler-Hart Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones; Jennifer Albero; Live Oak Assets LLC; Matthew N. Lynch and Barbara A. Lynch; MKM 22 West LLC; One Rumford Lane LLC; Salt Works LLC; and TTJR LLC; individually, derivatively, and as class representatives ..... Respondents/Appellants,

v.

Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PLBH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC; John Does 1-25 ..... Appellants/Respondents.

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**REQUEST FOR AN EXTENSION TO FILE INITIAL CROSS-RESPONSE BRIEFS**

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Cross-briefing is currently due to be filed in this appeal by March 10, 2023. Pursuant to Rules 206 and 240, SCACR, Respondents/ Appellants respectfully request an extension in which to file the Initial Response Brief and Designations of Matter, for all parties, until April 10, 2023. Counsel for Appellants/Respondents have advised that they do not oppose or object to this motion.

The basis for this request is humanitarian—the undersigned counsel has been called for two large trials over the next four weeks, each of which has required and will require a large amount of preparation. This matter before this Court also requires a large amount of preparation; it is a complex appeal that involves cross-appeals among more than 30 parties on numerous complex issues. For example, Appellants/Respondents’ initial brief is 50 pages in length, with an appendix. In addition to the two trials, the undersigned counsel also has an appellate brief due to the Fourth Circuit Court of Appeals in early March. In sum, it is a “[im]perfect storm” of big, important deadlines, for which counsel seek temporary relief.

Respondents/Appellants are mindful that extensions are not freely given absent extraordinary circumstances, and they respectfully ask this Court to find that these circumstances warrant mercy. For these reasons, Respondents/Appellants respectfully request that an extension be granted on the Response Brief and Designations of Matter, for each side, until April 10, 2023.

Respectfully submitted,

Ford Wallace Thomson LLC

s/ Ian Ford

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Corley CW LLC; 368 Mount Pelia LLC; Bridge  
Charleston Investments B LLC; Bridge Charleston  
Investments C LLC; Bridge Charleston  
Investments E LLC; Bridge Charleston  
Investments H LLC; Anne Bosler and Dylan  
Hart as Trustees of the Bosler-Hart Trust;  
Geoffrey J. Block; R. Jeffrey Kimball and Deborah  
S. Kimball; Sebrina Leigh-Jones and Chris Leigh-  
Jones; Jennifer Albero; Live Oak Assets LLC;  
Matthew N. Lynch and Barbara A. Lynch; MKM  
22 West LLC; One Rumford Lane LLC; Salt  
Works LLC; and TTJR LLC; individually,  
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**PROOF OF SERVICE**

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I certify that on February 23, 2023, I have served Respondents/Cross-Appellants' REQUEST FOR AN EXTENSION TO FILE INITIAL CROSS-RESPONSE BRIEFS on Appellants/Respondents Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PLBH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC; John Does 1-25 by emailing a copy of the same to the following counsel of record using the primary email address listed in the Attorney Information System:

Val H. Stieglitz: [VStieglitz@nexsenpruet.com](mailto:VStieglitz@nexsenpruet.com)

Bruce Wallace: [BUWallace@nexsenpruet.com](mailto:BUWallace@nexsenpruet.com)

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Respectfully submitted,

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February 23, 2023

**Subject:** 2022-001587 | Palmetto Bluff | Motion for Extension  
**Date:** Thursday, February 23, 2023 at 8:52:14 AM Eastern Standard Time  
**From:** Ian Ford  
**To:** Stieglitz, Val H., Wallace, Bruce, Small, Kirsten E.  
**CC:** Ainsley Tillman, Hunter James  
**BCC:** Ian Ford  
**Attachments:** Motion for Extension.pdf, POS.pdf

Good morning, Team NP. Attached for service please find:

1. Request For An Extension To File Initial Cross-Response Briefs
2. Proof of Service

We'll copy you on the email filings as well.

Thanks.

Ian

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Ian S. Ford

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