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**Apr 03 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

The Honorable R. Ferrell Cothran, Jr., Circuit Court Judge

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Circuit Court Case No. 2022-CP-07-00632  
Court of Appeals 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/Cross-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; and John Does 1-25 .....Appellants/Cross-Respondents.

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**RESPONDENTS' REQUEST FOR AN EXTENSION**

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Respondents/Cross-Appellants' ("Respondents") Initial Response Brief and Designation of Matter in this appeal are due to be filed on April 10, 2023, pursuant to this Court's Order dated February 23, 2023.

**Respondents respectfully request an additional extension of 30 days, until May 9, 2023.** Respondents are mindful that such extensions are permitted only in extraordinary circumstances. By their signatures below, the undersigned counsel attests to this Court that they are in the midst of truly exceptional circumstances, including an extraordinarily challenging workload which involves an ongoing, multi-week wrongful death jury trial (Charleston County Case No. 2019-10-00061, *Rash v. South Carolina Dept. of Trans. et al.*). The trial has now extended beyond its expected two weeks into a third week. Work on this trial has been incredibly demanding and has commanded 14-hour work-days on the part of the undersigned, for weeks now. Meeting the current briefing deadline of April 10, 2023 in this appeal is simply beyond their capacity.

This request is made in good faith and not for the purpose of delay.

Respondents respectfully ask this Court to grant them until May 9, 2023 to file their initial response brief and designation of matter.

**[signature appears on next page]**

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/ Ainsley F. Tillman

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*Attorneys for Respondents/Cross-Appellants*

Charleston, South Carolina

April 2, 2023

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**PROOF OF SERVICE**

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I certify that on April 2, 2023, I have served the Respondents/Cross-Appellants'

*Request for an Extension* on Appellants/Respondents by emailing a copy of the same to their counsel of record using the email address listed in the Attorney Information System:

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Respectfully submitted,

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