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**Jun 20 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from York County  
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

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Appellate Case No. 2022-000580  
Circuit Court Case No. 2018-CP-46-03726

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The Grapevine of Riverwalk, Inc.,

Respondent,

v.

Riverwalk River District Building 6, LLC, Mark S. Mather, GRH  
Development Resources, LLC, The Greens of Rock Hill, LLC and  
Assured Administration, LLC,

Appellants.

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**SECOND MOTION FOR EXTENSION OF TIME TO  
SERVE/FILE INITIAL BRIEF OF RESPONDENT**

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CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No.: 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
(843) 720-5488  
*Attorneys for Respondent*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent The Grapevine of Riverwalk, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for a second extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

The Appellants served their initial brief on April 20, 2023; thereby, making the Respondent's initial briefing deadline May 22, 2023, according to Rule 208(a)(2), SCACR. Thereafter, the Respondent filed its first motion for extension of time, requesting extension of the deadline through June 21, 2023. This motion has not yet been acted upon by the Court.

On account of work-related and other time commitments, the undersigned respectfully requests the Respondent's deadline for filing/serving its initial brief and corresponding designation of matter to be included in the record on appeal be extended by 30 days from (the previously-requested deadline of) June 21, 2023. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

WHEREFORE, Respondent moves this Honorable Court to grant it an extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation

of matter would be July 21, 2023, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold its present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signature page for Second Motion for Extension of Time to Serve/File Initial Brief of Respondent, Appellate Case No. 2022-000580]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown

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Charleston, South Carolina

June 20, 2023

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Development Resources, LLC, The Greens of Rock Hill, LLC and  
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Appellants.

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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*Attorneys for Respondent*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on June 20, 2023, via email (see attached) to their following counsel of record:

Ian S. Ford, Esquire, [ian.ford@fordwallace.com](mailto:ian.ford@fordwallace.com)  
Ainsley F. Tillman, Esquire, [Ainsley.Tillman@FordWallace.com](mailto:Ainsley.Tillman@FordWallace.com)  
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715 King Street  
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*Attorneys for Appellants*

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*  
Stephen L. Brown  
*Attorneys for Respondent*

Charleston, South Carolina

June 20, 2023

## **Bell, Pollyana (Polly)**

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**From:** Bell, Pollyana (Polly)  
**Sent:** Tuesday, June 20, 2023 1:07 PM  
**To:** 'ian.ford@fordwallace.com'; 'Ainsley.Tillman@FordWallace.com'  
**Cc:** 'Stephen Brown (sbrown@ycrlaw.com)'; Hines, Russell; Justman, Aimee  
**Subject:** The Grapevine of Riverwalk, Inc. v. Riverwalk River District Building 6, LLC // Appellate Case No. 2022-000580 (CR 220062)  
**Attachments:** 2nd Motion for Extension - Initial Brief.pdf

Enclosed please find Respondent's Second Motion for Extension of Time to Serve/File their Initial Brief which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
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