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Oct 09 2023

SC Court of Appeals

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

Appeal from York County
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

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

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.

**MOTION FOR EXTENSION TO FILE RETURN TO APPELLANT'S
MOTION TO SUBSTITUTE SURETY BOND FOR CASH BOND**

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

COMES NOW Respondent, The Grapevine of Riverwalk, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' additional time to file/serve any Return to Appellants' Motion to Substitute Surety Bond for Cash Bond.

Presently, pursuant to Rule 240(e), SCACR, the deadline for Respondent's Return to Appellants' Motion to Substitute Surety Bond for Cash Bond is Today, October 9, 2023. On account of work-related and other time commitments (in particular, the present deadline falling at a time when Respondent's lead counsel, Stephen L. Brown, is out of the office on a family trip), Respondent respectfully requests this deadline be extended by 10 days. Respectfully, Respondent believes this relief is consistent with the interests of justice (especially in that it will allow it needed time to determine whether it might be able to consent to the subject motion) and will not work any undue prejudice upon Appellants.

WHEREFORE, Respondent moves this Honorable Court to grant it an extension of 10 days' time to file/serve any Return to Appellants' Motion to Substitute Surety Bond for Cash Bond. With the extension requested herein, the new deadline for filing/serving any Return would be October 19, 2023, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

[signature on next page]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

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

sbrown@ycrlaw.com

rhines@ycrlaw.com

Attorneys for Respondent

Charleston, South Carolina

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PROOF OF SERVICE

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

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that the **MOTION FOR EXTENSION TO FILE RETURN TO APPELLANT'S MOTION TO SUBSTITUTE SURETY BOND FOR CASH BOND** was served on all other parties to this appeal on October 9, 2023, via email (see attached) to their following counsel of record:

Ian S. Ford, Esquire, ian.ford@fordwallace.com
Ainsley F. Tillman, Esquire, Ainsley.Tillman@FordWallace.com
Ford Wallace Thomson, LLC
715 King Street
Charleston, SC 29403
Attorneys for Appellants

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines
Attorneys for Respondent

Charleston, South Carolina

October 9, 2023

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, October 9, 2023 2:51 PM
To: Ainsley Tillman; Ian Ford
Cc: Hines, Russell; Brown, Stephen L.; Justman, Aimee
Subject: The Grapevine of Riverwalk, Inc. v. Riverwalk River District Building 6, LLC // Appellate Case No. 2022-000580 (CR 220062)
Attachments: Mot. for Ext. to File Return to Appellant's Mot. to Subsitute Surety Bond for Cash Bond.pdf

Enclosed please find Respondent's Motion for Extension to File Return to Appellant's Motion to Substitute Surety Bond for Cash Bond for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
FOR GREAT