

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Carmen Mullen, Circuit Court Judge

Appellate Case No. 2023-000924

**RECEIVED**

**Oct 27 2023**

**SC Court of Appeals**

Karon Mitchell, Kyle Mitchell, and  
Rabon & Rabon, Inc.,

Respondents,

v.

Jack Rabon, Nicole Rabon, Lane  
Jeffries, McNair Law Firm, P.A., Atid  
Properties, LLC, Daisy Ridge, LLC,  
Friends of LBS, LLC, Sarah Ginsburg,  
Jacob Biderman, Gabriel Yosef, and  
Michelle Cohen,

Defendants,

Of Whom:

Jack Rabon and Nicole Rabon,

Appellants,

and

Atid Properties, LLC and Jacob  
Biderman,

Cross-Claimants,

v.

Michelle Cohen,

Cross-Defendant.

**MOTION TO EXTEND TIME TO FILE RETURN TO  
MOTION TO DISMISS**

Appellants Jack Rabon and Nicole Rabon move pursuant to Rule 240, SCACR for an order extending time to file and serve the Return to Respondents' Motion to Dismiss. The

Motion to Dismiss was served by email on October 17, 2023. Appellants request this extension in order to provide counsel sufficient time to adequately research and prepare these pleadings. Appellants submit that this motion is not interposed for delay. Appellants also request that the Court of Appeals hold all time limits in abeyance pending its ruling on this motion.

Respectfully submitted,

October 27, 2023

s/ D. Alan Lazenby  
D. Alan Lazenby  
Lazenby Law Firm, LLC  
Post Office Box 6099  
Spartanburg, South Carolina 29304  
(864) 804-5050  
[alan@lazenbylawfirm.com](mailto:alan@lazenbylawfirm.com)  
SC Bar No. 13906

Attorney for Appellants

Other Counsel of Record:

Lauren L. Martel, Esq.  
Martel Law Office  
243 Club Gate Drive  
Bluffton, SC 29910

Tucker S. Player, Esq.  
Player Law Firm, LLC  
512 Village Church Drive  
Chapin, SC 29036

Howard W. Anderson III  
Truluck Thomason LLC  
3 Boyce Avenue  
Greenville, SC 29601