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Jun 17 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2019-CP-28-01137  
Appellate Case No. 2023-001193

Charles Ives, .....Appellant,

v.

Charles E. Campbell, Vivian C. Gardner, T. Clayter Campbell,  
Thomas Clayter Campbell, and Eddie Harold Goff, Trustees of the  
Colbert H. Campbell United Trust, Sonja C. Parker, Barry Campbell,  
and Randy Bowers ..... Respondents.

**RETURN TO MOTION FOR EXTENSION OF TIME**

Respondents **oppose** Appellant’s motion, filed June 14, 2024, for an indefinite extension of time to file his Initial Brief and Designation of Matter. Appellant seeks an indefinite extension pending the determination of this Court on Appellant’s motion to remand to reconvene mediation, which Respondents also oppose.

Respondents **do not oppose** this Court granting Appellant **a definite extension of time** (e.g. 20 days or 30 days) to file their initial brief given that Counsel for the Appellant is new to this case and could conceivably need more time to file their initial brief.

Respondents’ concerns with Appellant’s motion as filed is that it seeks an indefinite extension to file their brief pending this Court’s determination of its motion to remand to reconvene mediation. This appeal has already been delayed substantially based on a stay awaiting exhibits from the Circuit

Court, an extension of time for the Appellant to hire new appellate counsel after its initial appellate counsel withdrew, and a 30-day extension requested by Appellant's counsel when they filed an appearance on May 3, 2024. Respondents oppose the related motion to remand this case to reconvene mediation for the reasons stated in their return to that motion namely: (1) this case has already been mediated and the Respondents do not believe it would be worthwhile to mediate it again particularly given nature of Appellant's unusual claims; and (2) Respondents will be prejudiced by continued delay of this appeal caused by Appellant's motion to remand.

### CONCLUSION

For the reasons stated above, Respondents **oppose** Appellant's motion for an extension of time **as stated**. However, Respondents do not oppose this Court granting Appellant a second definite term extension of time (e.g. 20 or 30 days) to file their initial brief.

Respectfully submitted by,

**CROMER BABB & PORTER, LLC**

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**Attorneys for Defendants**

June 17, 2024  
Columbia, South Carolina

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**PROOF OF SERVICE**

I, Gina Blyler, an employee of with Cromer Babb & Porter, do hereby certify that on June 17, 2024, served a copy of the **Return to Motion for Extension of Time**, in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

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June 17, 2024

  
Gina A. Blyler, Litigation Paralegal