

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Case No. 2024-001404

Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and PMI Properties LLC Respondents / Appellants,

v.

Research Park, LLC Appellant / Respondent.

**CONSENT MOTION TO HOLD APPELLATE DEADLINES IN ABEYANCE
PENDING FURTHER DECISIONS OF THE TRIAL COURT**

Appellant/Respondent Research Park, LLC (“Appellant”) hereby submits this Motion, with the consent of Respondents/Appellants (“Respondents”), to hold appellate deadlines in abeyance pending further decisions of the trial court. The material circumstances underlying this Motion are as follows:

1. By orders filed July 26 and 29, 2024, respectively, the latter of which amended and corrected the former, and another order filed August 27, 2024, the trial court finally disposed of some—but not all—appealable issues in this case.

2. The matters that remain outstanding for decision are reflected in the aforementioned orders, and they pertain generally to the amount of attorneys’ fees to be awarded Respondents, as well as to Respondents’ obligation to remove certain structures from their property. All briefing on these matters has concluded, and the trial court has not

indicated that an additional hearing on these matters will be held. Accordingly, it would seem that the only matter remaining is the trial court's issuance of a written decision(s) disposing of these issues and entry of final judgment.

3. At such time as the trial court decides the remaining matters, resulting in a final judgment, Appellant anticipates filing another notice of appeal as to those matters, and a motion to consolidate those appellate proceedings with these and/or an amended notice of appeal. Respondents may also wish to file a notice of appeal from that final decision.

4. The matters presented in this appeal ought to be considered with the matters that are yet to be decided. Therefore, for the sake of efficiency and expediency, Appellant—with the consent of Respondents—respectfully requests that all deadlines appurtenant to this appellate proceeding, including Respondents' cross-appeal, be stayed and held in abeyance, pending the trial court's rendering of a final judgment as to the matters remaining in dispute, in furtherance of a single, comprehensive appellate proceeding.

Separately and by U.S. Mail, Appellant has submitted the filing fee to the Clerk of Court.

Respectfully submitted,

s/ Steven Edward Buckingham

Steven Edward Buckingham (S.C. Bar No. 0075089)
The Law Office of Steven Edward Buckingham, LLC
16 Wellington Avenue
Greenville, South Carolina 29609
(o) 864.735.0832
(e) seb@buckingham.legal

Attorney for Appellant

Filed this 26th Day of September, 2024.
Greenville, South Carolina

We Consent:

William A. Coates, Esq. (S.C. Bar No. 0001289)
Cassidy Coates Price, P.A.
1052 N. Church Street
Greenville, SC 29601
(o) 864.349.2600
(e) wac@cassidycoates.com

Stephen L. Brown, Esq. (S.C. Bar No. 0066468)
Russell G. Hines, Esq. (S.C. Bar No. 0072100)
Clement Rivers, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401
(o) 843-720-5488
(e) sbrown@ycrlaw.com
(e) rhines@ycrlaw.com

Marwan S. Zubi, Esq. (Pro Hac Vice)
Nicolai Law Group, P.C.
1500 Main Street / Suite 1914
Springfield, MA 01115
(o) 413.272.2000
(e) marwan.zubi@niclawgrp.com

Attorneys for Respondents

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PROOF OF SERVICE

The undersigned counsel for Appellant hereby certifies, subject to penalty of perjury, that the following document(s) was/were served upon the following counsel of record by the following means as of the date identified below.

Document(s): Consent Motion to Hold Appellate Deadlines in Abeyance

Counsel Served: For Respondents

William A. Coates, Esq. (S.C. Bar No. 0001289)
Cassidy Coates Price, P.A.
(e) wac@cassidycoates.com

Means of Delivery: *Via Email Only*

Marwan S. Zubi, Esq. (Pro Hac Vice)
Nicolai Law Group, P.C.
(e) marwan.zubi@niclawgrp.com

Means of Delivery: *Via Email Only*

Stephen L. Brown, Esq. (S.C. Bar No. 066468)
Russell G. Hines, Esq. (S.C. Bar No. 072100)

Clement Rivers, LLP
(e) sbrown@ycrlaw.com
(e) rhines@ycrlaw.com

Means of Delivery: *Via Email Only*

Courts Served: Office of the Clerk of the Court of Appeals
ctappfilings@sccourts.org

Means of Delivery: *Via Email Only*

Date: September 26, 2024

Respectfully,

s/ Steven Edward Buckingham

Steven Edward Buckingham (S.C. Bar No. 0075089)
The Law Office of Steven Edward Buckingham
16 Wellington Avenue
Greenville, South Carolina 29609
(o) 864.735.0832
(e) seb@buckingham.legal

Attorney for Appellant