

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

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Case No. 2024-001404

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

v.

Research Park, LLC . . . . . Appellant / Respondent.

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**APPELLANT’S MOTION, IN THE ALTERNATIVE, FOR AN ENLARGEMENT  
OF TIME**

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**PLEASE TAKE NOTICE THAT,** pursuant to Rule 240, SCACR, the undersigned counsel for Research Park, LLC, Appellant, is respectfully requesting an enlargement of the time within which to file and serve its initial opening brief, as well as its initial designation of matter for the record on appeal. In furtherance of this Motion, Appellant would respectfully advise that:

1. Presently, it appears that Appellant’s initial opening brief is due on September 28, 2024;
2. At the same time this Motion is filed, Appellant—joined by Respondents—has filed a motion to hold all appellate deadlines in abeyance. This is because (as explained in the motion) the trial court has yet to rule on a few outstanding issues from which appeal will be taken. The parties have submitted the request for abeyance so that

all issues in the underlying case may be joined together for the purposes of these appellate proceedings, once the trial court issues an order on those few remaining issues;

3. In the event the Court should grant the parties' request for abeyance, this Motion will be moot. However, if the request for abeyance is denied, Appellant would respectfully request a 30-day extension within which to file its initial opening brief and designation of matter for the record on appeal;
4. This is the first request for enlargement that Appellant has made in this case; and,
5. Prior to filing this Motion, Appellant's undersigned counsel consulted with counsel for Respondents, who has graciously consented.

If this request is granted and not otherwise mooted by the pending motion to hold deadlines in abeyance, Appellant's initial opening brief and designation of matter for the record on appeal will be due on October 28, 2024.

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

Respectfully submitted,

*s/ Steven Edward Buckingham*

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*Attorney for Appellant*

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

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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):** Appellant’s Motion, in the Alternative, for an Enlargement of Time to File Its Initial Opening Brief and Designation of Matter for the Record on Appeal

**Counsel Served:** For Respondents  
  
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**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*

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