

RECEIVED

Mar 06 2025

SC Court of Appeals

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. 2024-002150

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

v.

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

**APPELLANT / RESPONDENT’S 2<sup>nd</sup> MOTION FOR AN ENLARGEMENT OF  
TIME TO FILE ITS INITIAL OPENING BRIEF AND ITS INITIAL  
DESIGNATION OF MATTER FOR THE RECORD ON APPEAL**

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

1. The matter that forms the substance of these appellate proceedings is a cross-appeal arising from a bench trial of an action involving restrictive covenants in a commercial development park.

2. Presently, Movant’s deadline for filing its initial opening brief and designation of matter for the record on appeal is Friday, March 7, 2025.

3. On Wednesday, March 5, opposing counsel contacted the undersigned and asked whether Appellant / Respondent would consent to an extension of time for Respondents / Appellants to file and serve their initial opening brief and designation of matter. The undersigned readily agreed.

4. On further consideration, the undersigned perceived that it might be more convenient for the Court and the parties for initial briefs (and thereafter, responsive briefs) to be submitted at or about the same time.

5. Opposing counsel has expressed that it will be imminently filing a motion for an extension of its deadline to Friday, April 11, 2025. The undersigned has no objection to the extension requested.

6. Appellant / Respondent would respectfully request an order extending its initial filing deadlines to the same date. However, Appellant / Respondent understands that a 30-day extension from March 7 would place the filing deadline at Monday, April 7, 2025 (which is the Monday of the same week for which Respondents / Appellants will be seeking to extend their filing deadline).

7. Appellant / Respondent would therefore request an Order granting an extension of its initial filing deadlines to correspond with the extension that opposing counsel will be requesting—to Friday, April 11, 2025. But, if the Court is not inclined to extend Appellant / Respondent's deadline to the same date, Appellant / Respondent would request an extension of its filing deadlines until Monday, April 7, 2025.

8. Prior to filing this Motion, the undersigned conferred with counsel for Respondents / Appellants about the extension herein requested, who graciously consented. Their consent is reflected in written communications among counsel.

9. The filing fee for this Motion is being sent separately by U.S. Mail to the Office of the Clerk of the Court of Appeals.

**WHEREFORE**, Movant would respectfully request the entry of an order that would extend the time for Appellant / Respondent to file and serve its initial opening brief and designation of matter for the record on appeal to at least Monday, April 7, 2025, but preferably Friday, April 11, 2025.

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

Greenville, South Carolina  
March 6, 2025

RECEIVED

Mar 06 2025

SC Court of Appeals

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. 2024-002150

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

v.

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

**PROOF OF SERVICE**

The undersigned counsel for Appellant / Respondent 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 / Respondent’s 2<sup>nd</sup> Motion for an Enlargement of Time to File Its Initial Opening Brief and Designation of Matter for the Record on Appeal.

**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*

With the Motion Filing Fee Being Sent Separately *Via U.S. Mail*  
Post Office Box 11629  
Columbia, SC 29211

**Date:** March 6, 2025

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 / Respondent*