

**RECEIVED**

**Apr 03 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge  
Mikell R. Scarborough, Circuit Court Judge

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Case No. 2016-CP-10-02955  
Appellate Case No. 2021-000272

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TCC of Charleston, Inc.,

Appellant/Respondent,

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, Edward T. Strom, 304 Concord & Cumberland, LLC, Marion M. Simpson f/k/a Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

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**MOTION FOR EXTENSION OF TIME  
TO PETITION FOR REHEARING**

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CLEMENT RIVERS, LLP

Edward D. Buckley, Jr. (SC Bar No. 994)

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*Attorneys for Respondent Betty L. Beatty*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent, Betty L. Beatty, by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed March 19, 2025. *See TCC of Charleston, Inc. v. Concord and Cumberland, LLC, et al.*, Op. No. 6106.

Rule 221(a), SCACR, provides, "Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court." Based on the March 19, 2025, filing of the Court's opinion in this case, the present deadline to petition for rehearing is the close of business Thursday, April 3, 2025, which, in accordance with Rule 263(a), SCACR (regarding computation of time), is the 15<sup>th</sup> day after the opinion's filing. Because of work-related and other time commitments, the undersigned counsel for Respondent requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Respondent requests the Court grant her an extension of 15 days' time to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing April 18, 2025. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Respondent requests the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

Respectfully Submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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Charleston, South Carolina

April 3, 2025

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Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

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**PROOF OF SERVICE**

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*Attorneys for Respondent Betty L. Beatty*

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Respondent Betty L. Beatty, do hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on all other parties to this matter on April 3, 2025, via email (see attached) to their counsel of record:

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*and*

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Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/ Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Respondent Betty L. Beatty*

Charleston, South Carolina

April 3, 2025

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, April 3, 2025 2:30 PM  
**To:** Jaan Rannik; Angela Gross; Ford, Cordes; Grimball, Henry; Walden, Andrew; Casey, Carol; mendemann@clarksonwalsh.com  
**Cc:** Hines, Russell; Buckley, Edward D. (Ed); Justman, Aimee  
**Subject:** TCC of Charleston, Inc. v. Concord and Cumberland, LLC; Appellate Case No. 2021-000272 (CR 160538)  
**Attachments:** Motion for Extension - Petition for Rehearing.pdf

Enclosed please find Respondent Betty L. Beatty's Motion for Extension of Time to Petition for Rehearing for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



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