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Apr 11 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. 2021-CP-04-01349
Appellate Case No. 2024-002150

Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, PMI Properties, LLC,

Respondents/Appellants,

v.

Research Park, LLC,

Appellant/Respondent.

**RESPONDENTS/APPELLANTS' CONSENT MOTION FOR EXTENSION
OF TIME TO APRIL 18, 2025, TO FILE/SERVE INITIAL APPELLANTS' BRIEF**

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NOW COME Respondents/Appellants, Poly-Med, Inc., Technology Drive 51, LLC, Technology Drive 52, LLC, PMI Properties, LLC (collectively, “Plaintiffs”), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, with the consent of Appellant/Respondent, Research Park, LLC (“Defendant”), and hereby move for an extension of time to Friday, April 18, 2025, to file/serve their initial appellants’ brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed March 12, 2025, the deadline for Plaintiffs’ initial appellants’ brief and designation of matter is April 11, 2025. On account of work-related and other time commitments—and the coincidence of a number of them at or about this time— together with the nature/number of the issues in this case, the undersigned remains in need of a small amount of additional time to complete Plaintiffs’ initial appellants’ brief and most respectfully asks the Court to deem the circumstances worthy of the relief requested herein, which relief, the undersigned most respectfully submits, is warranted as a reasonable dispensation that is consistent with the interests of justice that will not result in any undue prejudice to Defendant, who, indeed, consents to the Court’s grant of such relief.¹

WHEREFORE, Plaintiffs move this Honorable Court to grant them an extension of time through next Friday, April 18, 2025, to file/serve their initial appellants’ brief and corresponding designation of matter to be included in the record on appeal. Plaintiffs further ask that the Court hold the present deadline in abeyance until it acts upon this motion.

<SIGNED ON THE FOLLOWING PAGE>

¹ Prior to filing the instant motion, the undersigned consulted with Defendant’s attorney Steven Edward Buckingham, who kindly authorized the undersigned to represent to the Court that Defendant consents to the instant motion.

Respectfully submitted,

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents/Appellants, hereby certify that **RESPONDENTS/APPELLANTS' CONSENT MOTION FOR EXTENSION OF TIME TO APRIL 18, 2025, TO FILE/SERVE INITIAL APPELLANTS' BRIEF** was served on Appellant/Respondent on April 11, 2025, by emailing (see attached email) a copy of the same to Appellant/Respondent's counsel of record—and that it was likewise served on Respondents/Appellants' own additional counsel:

Steven Edward Buckingham, Esquire
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Respectfully submitted,

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Charleston, South Carolina

April 11, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, April 11, 2025 3:30 PM
To: seb@buckingham.legal; kirk@mllawyers.com; wac@cassidycoates.com; rplyler@cassidycoates.com; Marwan S. Zubi
Cc: Hines, Russell; Justman, Aimee; Brown, Stephen L.
Subject: Poly-Med, Inc. v. Research Park, LLC ; Appellate Case No. 2024-002150 (CR 240167)
Attachments: Consent Motion for Extension to 4-18-25.pdf

Enclosed please find Respondents/Appellants' Consent Motion for Extension of Time to April 18, 2025, to File/Serve their Initial Appellants' Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.

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