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Apr 17 2025

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

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

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

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.

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

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 a second 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.

Presently, by order of this Court filed April 4, 2025, the deadline to petition for rehearing is April 18, 2025. 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 May 5, 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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*Attorneys for Respondent Betty L.
Beatty*

Charleston, South Carolina

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Respondents,

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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 **SECOND MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING** was served on all other parties to this matter on April 17, 2025, via email (see attached) to their counsel of record:

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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 17, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, April 17, 2025 1:14 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: 2nd Motion for Extension - Petition for Rehearing.pdf

Enclosed please find Respondent Betty L. Beatty's Second Motion for Extension of Time to Petition for Rehearing 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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