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Apr 18 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 MAY 2, 2025, TO FILE/SERVE INITIAL APPELLANTS' BRIEF**

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PMI Properties, LLC*

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, May 2, 2025, to file/serve their initial appellants’ brief and corresponding designation of matter to be included in the record on appeal.

By order of this Court filed March 12, 2025, the deadline for Plaintiffs’ initial appellants’ brief and designation of matter was extended to Friday, April 11, 2025. On account of work-related and other time commitments—and the coincidence of a number of them—together with the nature/number of the issues in this case, on April 11, 2025, the undersigned moved for an extension of the subject deadline to Friday, April 18, 2025, sincerely believing that the requested extension would allow him time to complete Plaintiffs’ initial appellants brief; however, as before, and for the same reasons as before, the undersigned still remains in need of additional time, and therefore again most respectfully asks the Court to deem the circumstances—which also implicate the undersigned’s co-counsel Marwan S. Zubi’s longstanding plans to be out of the office next week¹—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.²

¹ While the undersigned is the primary author of Plaintiffs’ initial appellants’ brief, Mr. Zubi was Plaintiffs’ lead counsel for the proceedings before the circuit court, and he will not be available to review the brief the undersigned is drafting until after next week. This is why the undersigned is asking for an extension of the subject deadline to Friday, May 2, 2025, rather than Friday, April 25, 2025.

² As with the prior motion, filed April 11, 2025, before filing the instant motion, the undersigned consulted with Defendant’s attorney Steven Edward Buckingham, who kindly

WHEREFORE, Plaintiffs move this Honorable Court to grant them an extension of time through Friday, May 2, 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 subject deadline in abeyance until it acts upon this motion.

<SIGNED ON THE FOLLOWING PAGE>

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 MAY 2, 2025, TO FILE/SERVE INITIAL APPELLANTS' BRIEF** was served on Appellant/Respondent on April 18, 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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-and-

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Respectfully submitted,

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PMI Properties, LLC*

Charleston, South Carolina

April 18, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, April 18, 2025 11:51 AM
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: Poly-Med v. Research Park (2024-001404 -- Consent Motion for Extension to 5-2-25.pdf

Enclosed please find Respondents/Appellants' Consent Motion for Extension of Time to May 2, 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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