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May 27 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Master-In-Equity

Hon. Deadra L. Jefferson, Circuit Court Judge
Hon. Mikell R. Scarborough, Master-In-Equity

Case No. 2016-CP-10-2955

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, Defendants,

Of Which Concord & Cumberland HPR is the Respondent/Appellant.

**MOTION OF ALL RESPONDENTS/APPELLANTS EXCEPT FOR BETTY L. BEATTY
FOR EXTENSION OF TIME TO FILE THEIR RETURN TO
APPELLANT/RESPONDENT TCC OF CHARLESTON, INC.'S PETITION FOR
REHEARING**

F. Cordes Ford IV (SC Bar No. 071644)
Henry E. Grimball (SC Bar No. 002313)
Robert Andrew Walden (SC Bar No. 101004)
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Attorneys for all Respondents/Appellants Except for Betty Beatty

The undersigned counsel, on behalf of all remaining Respondents/Appellants except for Betty Beatty and pursuant to Rule 263(b), SCACR, hereby moves the Court for an extension of time to file and serve their return to Appellant/Respondent TCC of Charleston, Inc.'s petition for rehearing of this matter. Pursuant to the Court's letter dated May 19, 2025, the current deadline is May 29, 2025.

Because of work-related and other time commitments, the undersigned counsel for all remaining Respondents/Appellants except for Betty Beatty requests the Court's allowance of ten (10) days' additional time, up to and including June 9, 2025, to file the requested return. 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, all remaining Respondents/Appellants except for Betty Beatty request the Court grant an extension of 10 days' time to file and serve a return to Appellant/Respondent TCC of Charleston, Inc.'s petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to file and serve a return to Appellant/Respondent TCC of Charleston, Inc.'s petition for rehearing June 9, 2025.

ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, all remaining Respondents/Appellants except for Betty Beatty request the Court hold the present deadline to file and serve their return to Appellant/Respondent TCC of Charleston, Inc.'s petition for rehearing in abeyance until the Court acts on this motion.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

A handwritten signature in blue ink, appearing to read "Cordes Ford", is centered below the firm name.

F. Cordes Ford IV (SC Bar No. 071644)
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Attorneys for All Respondents/Appellants Except for Betty Beatty

May 27, 2025
Charleston, South Carolina

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Of Which Concord & Cumberland HPR is the Respondent/Appellant.

PROOF OF SERVICE

I, F. Cordes Ford IV, certify that I have served the foregoing **MOTION OF ALL RESPONDENTS/APPELLANTS EXCEPT FOR BETTY L. BEATTY FOR EXTENSION OF TIME TO FILE THEIR RETURN TO APPELLANT/RESPONDENT TCC OF CHARLESTON, INC.’S PETITION FOR REHEARING** On all other parties to this matter via electronic mail on May 27, 2025, addressed to their attorneys of record as follows, as evidenced by Exhibit “A” attached hereto:

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May 27, 2025
Charleston, South Carolina

From: Casey, Carol
Sent: Tuesday, May 27, 2025 3:17 PM
To: Jaan Rannik; mendemann@clarksonwalsh.com; Buckley, Edward D. (Ed); sbarr@ycrlaw.com; Hines, Russell; william.shannon@usdoj.gov
Cc: Ford, Cordes; Walden, Andrew; Grimbball, Henry
Subject: TCC of Charleston, Inc. v. Concord and Cumberland HPR, LLC - Appellate Case No. 2021-000272
Attachments: Respondent-Appellant's Motion for Extension of Time to file Return to TCC of Charleston's Petition for Rehearing 4938-7279-1601 v.1.pdf

Attached for service, please find Motion of All Respondents/Appellants except for Betty Beatty's Motion for Extension of Time to file Return to TCC of Charleston's Petition for Rehearing in this matter.

Thank you,
Carol

Carol Casey
Paralegal
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