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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 for the Ninth Circuit

The Honorable Mikell Scarborough, Master in Equity

Case No. 2016-CP-10-2955

Appellate Case No. 2021-000272

TCC of Charleston, Inc. *Plaintiff and 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 and Respondents/Appellants*

**MOTION OF APPELLANT/RESPONDENT FOR EXTENSION OF TIME TO
FILE RETURN TO RESPONDENTS/APPELLANTS' PETITIONS FOR REHEARING**

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ATTORNEY FOR TCC OF CHARLESTON, INC.

The undersigned counsel, on behalf of Appellant/Respondent and pursuant to Rule 263(b), SCACR, hereby moves the Court for an extension of time to file and serve its return to both of Respondents/Appellants' Petitions for Rehearing in 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 Appellant/Respondent 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, the Appellant/Respondent requests the Court grant an extension of ten (10) days' time to file and serve a return to Respondents/Appellants' Petitions for Rehearing. By the undersigned calculations, the grant of this relief would make the new deadline to file and serve a return to Respondents/Appellant's Petitions for Rehearing June 9, 2025.

ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellant/Respondent requests the Court hold the present deadline to file and serve their return to Respondents/Appellant's Petitions for Rehearing in abeyance until the Court acts on this motion.

[signature block on next page]

This 27th day of May, 2025
Charleston, South Carolina

Respectfully submitted:

EPTING & RANNIK, LLC

/s/ Jaan Rannik

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PROOF OF SERVICE

I certify that I have served the Appellant/Respondent TCC of Charleston, Inc.’s Motion for Extension of Time to File Return to Respondent/Appellants’ Petitions for Rehearing on May 27 2025, addressed to Respondents/Appellants’ counsel of record *via* email to the email addresses below:

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May 27, 2025
Charleston, South Carolina

EPTING & RANNIK, LLC

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