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May 29 2025

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

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.

**RESPONDENT BETTY L. BEATTY'S
MOTION FOR EXTENSION OF TIME TO SERVE/FILE
RETURN TO APPELLANT/RESPONDENT'S PETITION FOR REHEARING**

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Attorneys for Respondent Betty L. Beatty

By and through her undersigned counsel, pursuant to Rule 263(b), SCACR, Respondent Betty L. Beatty (“Beatty”) moves for an extension of ten (10) days’ time to file/serve a return to Appellant/Respondent’s petition for rehearing of this matter.

Presently, pursuant to this Court’s letter of May 19, 2025, the deadline for Beatty’s return is May 29, 2025. Because of work-related and other time commitments, the undersigned counsel for Beatty requests the Court’s allowance of ten (10) days’ additional time. 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, Beatty requests that the Court grant her an extension of ten (10) days’ time to serve/file her return. By the undersigned’s calculations, the grant of this relief would make the new deadline for Beatty’s return June 9, 2025. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Beatty requests that the Court hold the present deadline for Beatty’s return in abeyance until the Court acts on this motion.

Respectfully Submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Charleston, South Carolina

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Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

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, certify that **RESPONDENT BETTY L. BEATTY’S MOTION FOR EXTENSION OF TIME TO SERVE/FILE RETURN TO APPELLANT/RESPONDENT’S PETITION FOR REHEARING** was served on all other parties to this matter on May 29, 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

May 29, 2025

Hines, Russell

From: Hines, Russell
Sent: Thursday, May 29, 2025 9:16 PM
To: jgr@epting-law.com; mendemann@clarksonwalsh.com; cordes.ford@wbd-us.com; henry.grimball@wbd-us.com; andrew.walden@wbd-us.com
Cc: Buckley, Edward D. (Ed); Barr, Jr., W. Siau; Bell, Pollyana (Polly); Justman, Aimee
Subject: TCC v. Concord and Cumberland (21-000272) -- Respondent Betty L. Beatty's Petition for Rehearing
Attachments: TCC v. Concord (21-000272) -- Respondent Betty L. Beatty's Motion for Extension re Return to Petition for Rehearing.pdf

Attached for service in the above-referenced matter please find **Respondent Betty L. Beatty's Motion for Extension of Time to Serve/File Return to Appellant/Respondent's Petition for Rehearing.**

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