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Jun 05 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.

**SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE
INITIAL RESPONDENTS' BRIEF OF RESPONDENTS/APPELLANTS**

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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, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby move for an extension of thirty (30) days' time to file/serve their initial respondents' brief and any corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed May 12, 2025, Respondents/Appellants' initial respondents' brief is due Wednesday, June 11, 2025. Because of work-related and other time commitments, including a pre-planned family vacation for the undersigned, Respondents/Appellants' undersigned counsel respectfully requests that this deadline be extended by thirty (30) days. Respectfully, Respondents/Appellants counsel submits that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant/Respondent.

WHEREFORE, Respondents/Appellants move this Honorable Court to grant them an extension of thirty (30) days' time to file/serve their initial respondents' brief and any corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial respondents' brief and any corresponding designation of matter would be July 11, 2025, according to the undersigned's calculations. Further, Respondents/Appellants respectfully request that the Court hold the present deadline in abeyance until it acts upon this motion.

[signature on next page]

Respectfully submitted,

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents/Appellants, hereby certify that **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL RESPONDENTS' BRIEF OF RESPONDENTS/APPELLANTS** was served on Appellant/Respondent on June 5, 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:

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Charleston, South Carolina

June 5, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, June 5, 2025 3:08 PM
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: 2nd Motion for Extension of Time re Our Initial Respondents' Brief.pdf

Enclosed please find Respondents/Appellants' Second Motion for Extension of Time to File/Serve their Initial Respondents' Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
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