



# CLEMENT RIVERS, LLP

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June 6, 2025

**RECEIVED**

JUN 10 2025

SC Court of Appeals

104925

**VIA US MAIL**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Poly-Med, Inc., Technology Drive 51, LLC, Technology Drive 52, LLC, PMI  
Properties, LLC v. Research Park, LLC  
Appellate Case No.: 2024-002150  
Case No.: 2021-CP-04-01349  
YCR File: 16415-20240167

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing fee for Respondents/Appellants' Second Motion for Extension of Time to File/Serve their Initial Respondents' Brief, which was electronically filed on June 5, 2025, in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell  
Secretary

/pbb  
Enclosure(s)

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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

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**JUN 10 2025**

**SC Court of Appeals**

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**

Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
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PMI Properties, LLC*

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*Attorneys for Respondents/Appellants  
Poly-Med, Inc., Technology Drive 51, LLC,  
Technology Drive 52, LLC, and  
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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Charleston, South Carolina

June 5, 2025

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Respondents/Appellants

Poly-Med, Inc., Technology Drive 51, LLC,  
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v.

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Appellant/Respondent.

**PROOF OF SERVICE**

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*Attorneys for Respondents/Appellants  
Poly-Med, Inc., Technology Drive 51, LLC,  
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PMI Properties, LLC*

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:

Steven Edward Buckingham, Esquire  
THE LAW OFFICE OF STEVEN EDWARD  
BUCKINGHAM, LLC  
[seb@buckingham.legal](mailto:seb@buckingham.legal)

-and-

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Research Park, LLC*

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Technology Drive 52, LLC, and  
PMI Properties, LLC*

Respectfully submitted,

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Poly-Med, Inc., Technology Drive 51, LLC,  
Technology Drive 52, LLC, and  
PMI Properties, LLC*

Charleston, South Carolina

June 5, 2025

**Bell, Pollyana (Polly)**

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**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,  
Russell G. Hines, Stephen A. Griffith, Jr.

**Commercial Litigation Practice Group**

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