

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

**RECEIVED**

**Aug 18 2025**

**S.C. SUPREME COURT**

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2024-002098  
Court of Appeals Case No. 2022-001587

315 Corley CW LLC; 368 Mount Pelia LLC; Bridge  
Charleston Investments B LLC; Bridge Charleston  
Investments C LLC; Bridge Charleston Investments E  
LLC; Bridge Charleston Investments H LLC; Anne  
Bosler and Dylan Hart as Trustees of the Bosler-Hart  
Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah  
S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones;  
Jennifer Albero; Live Oak Assets LLC; Matthew N.  
Lynch and Barbara A. Lynch; MKM 22 West LLC; One  
Rumford Lane LLC; Salt Works LLC; and TTJR LLC;  
individually, derivatively, and as  
class representatives.....Respondents,

v.

Palmetto Bluff Development, LLC; Palmetto Bluff Club,  
LLC; Palmetto Bluff Real Estate Company, LLC; PLBH,  
LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff  
Preservation Trust, Inc.; Palmetto Bluff Preservation  
Trust Board of Stewards: Jordan Phillips; Mark Polites;  
Gray Ferguson; Henry Armistead; South Street Partners  
LLC; and John Does 1-25.....Petitioners.

---

**PROOF OF SERVICE**

---

I certify that on August 18, 2025, I have served the Respondents' *MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' BRIEF* on Petitioners by emailing a copy of the same to their counsel of record using the email address listed in the Attorney Information System:

Val H. Stieglitz: [VStieglitz@nexsenpruet.com](mailto:VStieglitz@nexsenpruet.com)

Bruce Wallace: [Wallace@nexsenpruet.com](mailto:Wallace@nexsenpruet.com)

Kirsten E. Small: [KSmall@nexsenpruet.com](mailto:KSmall@nexsenpruet.com)

Donal Falk, *pro hac vice*: [DFalk@schaerr-jaffe.com](mailto:DFalk@schaerr-jaffe.com)

Respectfully submitted,

FORD WALLACE THOMSON LLC

/s/ Ian Ford

Ian S. Ford, S.C. Bar No. 12463

[Ian.Ford@FordWallace.com](mailto:Ian.Ford@FordWallace.com)

Ainsley F. Tillman, S.C. Bar No. 70551

[Ainsley.Tillman@FordWallace.com](mailto:Ainsley.Tillman@FordWallace.com)

715 King Street

Charleston, SC 29403

(843) 277-2011

*Attorneys for Respondents*

Charleston, South Carolina  
August 18, 2025