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Aug 29 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Master-In-Equity

Hon. Deadra L. Jefferson, Circuit Court Judge
Hon. Mikell R. Scarborough, Master-In-Equity

Case No. 2016-CP-10-2955

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, Defendants,

Of Which Concord & Cumberland HPR is the Respondent/Appellant.

**MOTION OF ALL RESPONDENTS/APPELLANTS EXCEPT FOR BETTY L. BEATTY
FOR EXTENSION OF TIME TO FILE A PETITION FOR WRIT OF CERTIORARI**

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Robert Andrew Walden (SC Bar No. 101004)
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Attorneys for all Respondents/Appellants Except for Betty Beatty

The undersigned counsel, on behalf of all remaining Respondents/Appellants except for Betty Beatty and pursuant to Rule 263, SCACR, hereby moves the Court for an extension of time to file and serve a Petition for Writ of Certiorari in this matter. Pursuant to the to Rule 263, SCACR, the current deadline is August 29, 2025.

The parties are working on resolution of this matter, and the undersigned counsel for all remaining Respondents/Appellants except for Betty Beatty requests the Court's allowance of thirty (30) days' additional time, up to and including September 29, 2025, to file the requested petition. 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, all remaining Respondents/Appellants except for Betty Beatty request the Court grant an extension of 30 days' time to file and serve a Petition for Writ of Certiorari. By the undersigned's calculations, the grant of this relief would make the new deadline to file and serve a petition for writ of certiorari September 29, 2025.

ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, all remaining Respondents/Appellants except for Betty Beatty request the Court hold the present deadline to file and serve their petition for a writ of certiorari in abeyance until the Court acts on this motion.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

A handwritten signature in blue ink, appearing to read "Cordes Ford", is centered below the firm name.

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August 28, 2025
Charleston, South Carolina

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In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Master-In-Equity

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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.

PROOF OF SERVICE

I, F. Cordes Ford IV, certify that I have served the foregoing **MOTION OF ALL RESPONDENTS/APPELLANTS EXCEPT FOR BETTY L. BEATTY FOR EXTENSION OF TIME TO FILE A PETITION FOR WRIT OF CERTIORARI** on all other parties to this matter via electronic mail on August 28, 2025, addressed to their attorneys of record as follows, as evidenced by Exhibit "A" attached hereto:

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Attorneys for All Respondents/Appellants Except for
Betty Beatty

August 28, 2025
Charleston, South Carolina

EXHIBIT "A"

From: [Casey, Carol](#)
To: ["jgr@epting-law.com"](#); ["ebuckley@ycrlaw.com"](#); ["sbarr@ycrlaw.com"](#); ["rhines@ycrlaw.com"](#); [william.shannon@usdoj.gov](#)
Cc: [Ford, Cordes](#); [Walden, Andrew](#); [deHoll, Andrew](#); [Gwyn Martin](#)
Subject: TCC of Charleston, Inc. v. Concord and Cumberland, LLC, et al., App Case No. 2021-000272 - HPR's Motion for Extension of Time to File Petition for Writ of Certiorari
Date: Thursday, August 28, 2025 1:08:12 PM
Attachments: [Motion of All Respondents -Appellants except for Betty Beatty for Extension of Time to file Petition for Writ of Certiorari.pdf](#)

Attached for Service, please find a Motion of All Respondents/Appellants Except for Betty L. Beatty for Extension of Time to File a Petition for Writ of Certiorari in the referenced matter.

Kind regards,
Carol