

In the Supreme Court For the State of South Carolina

APPEAL FROM CHARLESTON COUNTY Court of Common Pleas for the Ninth Circuit

The Honorable Mikell Scarborough, Master in Equity

Case No.: 2016-CP-10-02955 App. Case No. 2021-000272

TCC OF CHARLESTON, INC. .... Plaintiff/Petitioner,

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 and Respondents.

MOTION OF PLAINTIFF/PETITIONER FOR EXTENSION OF TIME TO FILE PETITION FOR A WRIT OF CERTIORARI

Jaan G. Rannik (SC Bar No. 103014) Epting & Rannik, LLC 46A State Street Charleston, SC 29401 P: 843.377.1871 F: 843.377.1310 jgr@epting-law.com

ATTORNEY FOR TCC OF CHARLESTON, INC.

COMES NOW the above-named Plaintiff/Petitioner, pursuant to Rules 240 and 263(b), SCACR, moving this Honorable Court for an Order extending the time for filing and serving their Petition for Writ of Certiorari which is currently due on or before August 29, 2025. This is Petitioner's first request for an extension.

Counsel for Petitioner and Respondents are in discussions regarding a possible mediation of the case and would request the Court grant an extension of time of thirty (30) days through September 29, 2025 (as September 28 is a Sunday) for filing and serving their Petition for Writ of Certiorari.

Counsel for Petitioner would show that there is good cause to allow the requested extension of time, as it is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party.

**Respectfully submitted:**

**EPTING & RANNIK, LLC**

*/s/ Jaan Rannik*

\_\_\_\_\_  
Jaan G. Rannik  
46A State Street  
Charleston, SC 29401  
P: 843.377.1871  
F: 843.377.1310  
[jgr@epting-law.com](mailto:jgr@epting-law.com)

*ATTORNEY FOR PLAINTIFF/PETITIONER  
TCC OF CHARLESTON, INC.*

This 28<sup>th</sup> day of August, 2025  
Charleston, South Carolina