

RECEIVED

Sep 25 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.

**MOTION FOR EXTENSION OF TIME TO SERVE/FILE
RETURN TO MOTION FOR PARTIAL DISMISSAL AND, IF NECESSARY,
INITIAL REPLY BRIEF OF RESPONDENTS/APPELLANTS**

Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

*Attorneys for Respondents/Appellants
Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and
PMI Properties, LLC*

**Additional counsel identified on next page*

Willam A. Coates (SC Bar No. 1289)
Ross B. Plyler (SC Bar No. 71688)
CASSIDY COATES PRICE, P.A.
1052 North Church Street
Greenville, South Carolina 29601
P.O. Box. 10529 (29603)
(864) 349-2600

-and-

Marwan S. Zubi (admitted pro hac vice)
NICOLAI LAW GROUP, P.C.
198 Charlton Road, Suite 8
Sturbridge, Massachusetts 01566
P.O. Box 2840
Worcester, Massachusetts 01613
(413) 272-2000

*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 ten (10) days' time to serve/file their return to Appellant/Respondent, Research Park, LLC's ("Research Park"), motion for partial dismissal and, if necessary, their initial reply brief.

On September 15, 2025, Research Park served/filed both a motion to dismiss a portion of the cross-appeal as moot and its initial response brief to Respondents/Appellants' initial appellants' brief. Under Rule 240(e), SCACR, the deadline for Respondents/Appellants' return to the motion to dismiss is today, September 25, 2025. Under Rule 240(b), "[a] motion to dismiss an appeal . . . automatically stay[s] the time limits for perfecting the appeal until the motion is decided." Accordingly, this would appear to stay the time for Respondents/Appellants to serve/file their initial reply brief; however, if this automatic stay for some reason does not apply, under Rule 208(a)(3), SCACR, the deadline for Respondents/Appellants' initial reply brief would also be today, September 25, 2025.

On account of work-related and other time commitments, Respondents/Appellants' undersigned counsel respectfully requests an extension of ten (10) days' time to file/serve Respondents/Appellants' return to Research Park's motion for partial dismissal and, if necessary, their initial reply brief. Respectfully, Respondents/Appellants counsel submits that this relief is consistent with the interests of justice and will not work any undue prejudice upon Research Park.

WHEREFORE, Respondents/Appellants move this Honorable Court to grant them an extension of ten (10) days' time to serve/file their return to Research Park's motion for partial dismissal and, if necessary, their initial reply brief. With the extension requested herein, the new

deadline would be October 6, 2025, according to the undersigned's calculations. Further, Respondents/Appellants respectfully request that the Court hold the present deadline(s) in abeyance until it acts upon this motion.

Respectfully submitted,

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

-and-

Willam A. Coates (SC Bar No. 1289)
Ross B. Plyler (SC Bar No. 71688)
CASSIDY COATES PRICE, P.A.
1052 North Church Street
Greenville, South Carolina 29601
P.O. Box. 10529 (29603)
(864) 349-2600

-and-

Marwan S. Zubi (admitted pro hac vice)
NICOLAI LAW GROUP, P.C.
198 Charlton Road, Suite 8
Sturbridge, Massachusetts 01566
P.O. Box 2840
Worcester, Massachusetts 01613
(413) 272-2000

*Attorneys for Respondents/Appellants
Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and
PMI Properties, LLC*

Charleston, South Carolina

September 25, 2025

RECEIVED

Sep 25 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.

PROOF OF SERVICE

Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
CLEMENT RIVERS, LLP
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

*Attorneys for Respondents/Appellants
Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and
PMI Properties, LLC*

**Additional counsel identified on next page*

Willam A. Coates (SC Bar No. 1289)
Ross B. Plyler (SC Bar No. 71688)
CASSIDY COATES PRICE, P.A.
1052 North Church Street
Greenville, South Carolina 29601
P.O. Box. 10529 (29603)
(864) 349-2600

-and-

Marwan S. Zubi (admitted pro hac vice)
NICOLAI LAW GROUP, P.C.
198 Charlton Road, Suite 8
Sturbridge, Massachusetts 01566
P.O. Box 2840
Worcester, Massachusetts 01613
(413) 272-2000

*Attorneys for Respondents/Appellants
Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and
PMI Properties, LLC*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents/Appellants, hereby certify that the **MOTION FOR EXTENSION OF TIME TO SERVE/FILE RETURN TO MOTION FOR PARTIAL DISMISSAL AND, IF NECESSARY, INITIAL REPLY BRIEF OF RESPONDENTS/APPELLANTS** was served on Appellant/Respondent on September 25, 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

-and-

John Kirkman Moorhead, Esquire
MOORHEAD LEFEVRE, PA
kirk@mllawyers.com
*Attorneys for Appellant/Respondent
Research Park, LLC*

Willam A. Coates, Esquire
Ross B. Plyler, Esquire
CASSIDY COATES PRICE, P.A.
wac@cassidycoates.com
rplyler@cassidycoates.com

-and-

Marwan S. Zubi, Esquire
NICOLAI LAW GROUP, P.C.
marwan.zubi@niclawgrp.com
*Attorneys for Respondents/Appellants
Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and
PMI Properties, LLC*

Respectfully submitted,

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
CLEMENT RIVERS, LLP
*Attorneys for Respondents/Appellants
Poly-Med, Inc., Technology Drive 51, LLC,
Technology Drive 52, LLC, and
PMI Properties, LLC*

Charleston, South Carolina

September 25, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, September 25, 2025 2:15 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: Motion for Extension of Time re Initial Reply Brief & Return to MTD.pdf

Enclosed please find Respondents/Appellants' Motion for Extension of Time to Serve/File their Return to Motion for Partial Dismissal and, if Necessary, Initial Reply 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
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com

MatterId: