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Sep 29 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Mikell R. Scarborough
Master in Equity

Appellate Case No. 2025-001384

John Kachmarsky, individually, as Manager of K&T Group, LLC, and as Trustee of the Revocable Trust of John Kachmarsky dated November 30, 2007, as member of K&T Group, LLC, Appellant,

v.

David G. Taylor, individually and as Manager of K&T Group, LLC; Taylor Capital, LLC, as member of K&T Group, LLC; and K&T Group, LLC, and Foley Bullock, LLC, Respondents.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240, SCACR, Appellant John Kachmarsky, through his undersigned counsel, respectfully requests a thirty (30) day extension of time to file *Appellant's Initial Brief* and *Appellant's Designation of Matter to Include in the Record on Appeal*. This is Appellant's second request for an extension of time as to this filing. This extension is requested due to unavoidable obligations that have arisen in other matters over the course this month, including matters before the Circuit Court and on appeal to this Honorable Court.

Appellant's Initial Brief and Designation of Matter to Include in the Record on Appeal are currently due on Monday, October 6, 2025. If this Motion is granted, the new deadline for these filings will be Wednesday, November 5, 2025. A thirty (30) day extension of time will serve the interests of justice and aid this Court by allowing Appellant's appellate counsel adequate time to

brief the issues on appeal. Appellant does not request this extension for the impermissible purpose of delay.

Appellant also respectfully requests that this Honorable Court hold all deadlines in abeyance until an Order has been issued on this Motion.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

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Attorney for Appellant John Kachmarsky

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Mount Pleasant, South Carolina

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v.

David G. Taylor, individually and as Manager of K&T Group, LLC; Taylor Capital, LLC, as member of K&T Group, LLC; and K&T Group, LLC, and Foley Bullock, LLC, Respondents.

PROOF OF SERVICE

I, the undersigned, certify that I have served Appellant's *Motion for Extension of Time* on this 29th day of September on all counsel of record via electronic service through the sccourts.org e-file system and their AIS-designated email addresses contemporaneously with this filing as set forth below:

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Attorney for Appellant John Kachmarsky

September 29, 2025
Mount Pleasant, South Carolina

September 29, 2025

VIA FIRST CLASS MAIL AND
EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211



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RE: John Kachmarsky, individually, as Manager of K&T Group, LLC, and as Trustee of the Revocable Trust of John Kachmarsky dated November 30, 2007, as member of K&T Group, LLC, Appellant v. David G. Taylor, et al., Respondents, and Foley Bullock, LLC, Respondent.
Appellate Case No. 2025-001384

Dear Ms. Kitchings,

Attached for filing on behalf of Appellant John Kachmarsky, please find the following:

1. Appellant's Motion for Extension of Time, and
2. Proof of Service.

A check from my law firm for the filing fee of fifty dollars (\$50.00) has been deposited in today's outgoing mail. Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez
Jesse Sanchez (SC Bar No. 101906)

Attachments (as stated)

Cc (Via Email Only):

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