

**RECEIVED**

**Oct 02 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

Appeal from York County  
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

---

Appellate Case No. 2022-000580  
Circuit Court Case No. 2018-CP-46-03726

---

The Grapevine of Riverwalk, Inc.,

Respondent,

v.

Riverwalk River District Building 6, LLC, Mark S. Mather, GRH  
Development Resources, LLC, The Greens of Rock Hill, LLC and  
Assured Administration, LLC,

Appellants.

---

**MOTION FOR EXTENSION TO FILE  
RETURN TO PETITION FOR REHEARING**

---

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No.: 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
(843) 720-5488  
*Attorneys for Respondent*

COMES NOW Respondent, The Grapevine of Riverwalk, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' additional time to file/serve its Return to Appellants' Petition for Rehearing.

Presently, pursuant to the Court's letter dated September 23, 2025, the deadline for Respondent's Return to Appellants' Petition for Rehearing is Friday, October 3, 2025. On account of work-related and other time commitments (in particular, the present deadline falling at a time when Respondent's lead counsel, Stephen L. Brown, is expected to be out of the office for the entirety of this 10 day deadline due to depositions in a federal court action), Respondent respectfully requests this deadline be extended by 10 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

WHEREFORE, Respondent moves this Honorable Court to grant it an extension of 10 days' time to file/serve its Return to Appellants' Petition for Rehearing. With the extension requested herein, the new deadline for filing/serving any Return would be October 13, 2025, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

*[signature on next page]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown

Stephen L. Brown (SC Bar No.: 66468)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

(843) 720-5488

sbrown@ycrlaw.com

rhines@ycrlaw.com

*Attorneys for Respondent*

Charleston, South Carolina

October 2, 2025

**RECEIVED**

**Oct 02 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

Appeal from York County  
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

---

Appellate Case No. 2022-000580  
Circuit Court Case No. 2018-CP-46-03726

---

The Grapevine of Riverwalk, Inc.,

Respondent,

v.

Riverwalk River District Building 6, LLC, Mark S. Mather, GRH  
Development Resources, LLC, The Greens of Rock Hill, LLC and  
Assured Administration, LLC,

Appellants.

---

**PROOF OF SERVICE**

---

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No.: 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
(843) 720-5488  
*Attorneys for Respondent*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that the **MOTION FOR EXTENSION TO FILE RETURN TO PETITION FOR REHEARING** was served on all other parties to this appeal on October 2, 2025, via email (see attached) to their following counsel of record:

Ian S. Ford, Esquire, [ian.ford@fordwallace.com](mailto:ian.ford@fordwallace.com)  
Ainsley F. Tillman, Esquire, [Ainsley.Tillman@FordWallace.com](mailto:Ainsley.Tillman@FordWallace.com)  
Ford Wallace Thomson, LLC  
715 King Street  
Charleston, SC 29403  
*Attorneys for Appellants*

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown  
Stephen L. Brown  
*Attorneys for Respondent*

Charleston, South Carolina

October 2, 2025

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, October 2, 2025 12:47 PM  
**To:** 'Ian Ford'; 'Ainsley Tillman'; johanna.arias@fordwallace.com  
**Cc:** Hines, Russell; Brown, Stephen L.; Justman, Aimee; Olive, IV, Graydon  
**Subject:** The Grapevine of Riverwalk, Inc. v. Riverwalk River District Building 6, LLC // Appellate Case No. 2022-000580 (CR 220062)  
**Attachments:** Motion for Extension - Return to Petition for Rehearing.pdf

Enclosed please find Respondent's Motion for Extension to File their Return to Petition for Rehearing 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: