

RECEIVED

Nov 04 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  
DUE TO EXTRAORDINARY CIRCUMSTANCES

---

Pursuant to Rule 240, SCACR, Appellant John Kachmarsky, through his undersigned counsel, respectfully requests a **five (5) day extension** of time to file Appellant's Initial Brief and Appellant's Designation of Matter to Include in the Record on Appeal.

Undersigned counsel acknowledges that this Court has previously granted two extensions in this matter. This additional brief extension of only five days is requested due to extraordinary and unanticipated circumstances affecting undersigned counsel's ability to complete the brief by the current deadline:

1. **Conflicting Appellate Brief:** Undersigned counsel has another appellate brief in a separate matter (App. Case No. 2025-000403) that is due on the same date as the instant brief. That

brief required familiarization with a complex record and extensive research, resulting in a 38-page draft that demanded much of undersigned counsel's time and attention.

2. **Petition for Rehearing:** Undersigned counsel received notice of an appellate decision on October 15, 2025 (App. Case No. 2023-00029) requiring the timely drafting and filing of a Petition for Rehearing by October 30, 2025, during time that undersigned had reserved for preparation of the instant brief.
3. **Circuit Court Hearing:** Undersigned counsel has a contested circuit court hearing scheduled for November 6, 2025, one day after the current brief deadline. This hearing requires extensive preparation that undersigned counsel cannot delegate.

Despite these extraordinary demands on undersigned counsel's time, substantial progress has been made on Appellant's brief. Undersigned counsel requires only five additional days to ensure the brief meets this Court's standards and properly serves Appellant's interests.

Appellant's Initial Brief and Designation are currently due Wednesday, November 5, 2025. If granted, the new deadline would be Monday, November 10, 2025. This minimal extension will serve the interests of justice by allowing undersigned counsel adequate time to complete the brief without prejudicing Respondents, who have not yet filed their brief. Neither Appellant nor undersigned counsel seeks this extension for purposes of delay.

Appellant respectfully requests that this Court hold all deadlines in abeyance pending ruling on this Motion.

[Signature on following page]

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esq. (SC Bar No. 101906)

751 Johnnie Dodds Blvd., Suite 200

Mt. Pleasant, South Carolina 29464

[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

(843) 814-8181

**Attorney for Appellant John Kachmarsky**

November 4, 2025

Mount Pleasant, South Carolina

RECEIVED

Nov 04 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.

---

PROOF OF SERVICE

---

I, the undersigned, certify that I have served Appellant's *Motion for Extension of Time* on this 4th day of November, 2025 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:

Brian C. Duffy, Esq.  
Wilson Daniel, Esq.  
Forrest William Lewis, Esq.  
DUFFY & YOUNG, LLC  
96 Broad Street  
Charleston, South Carolina 29401  
bduffy@duffyandyoung.com  
wdaniel@duffyandyoung.com  
rwehrman@duffyandyoung.com

*Attorneys for Respondents 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

Jamie A. Khan, Esq.  
Forrest W. Lewis, Esq.  
McCULLOUGH ▪ KHAN ▪ APPEL  
2036 eWall Street, Suite 200  
Mount Pleasant, SC 29464  
jamie@mklawsc.com  
forrest@mklawsc.com

Jaan G. Rannick, Esq.  
EPTING & RANNIK, LLC  
46A State Street  
Charleston, SC 29401  
jgr@epting-law.com

*Attorney for Respondent Foley Bullock, LLC*

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez  
Jesse Sanchez, Esq. (SC Bar No. 101906)  
751 Johnnie Dodds Blvd., Suite 200  
Mt. Pleasant, South Carolina 29464  
jesse@jessesanchezlaw.com  
(843) 814-8181

**Attorney for Appellant John Kachmarsky**

November 4, 2025  
Mount Pleasant, South Carolina

November 4, 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

**RECEIVED**

**Nov 04 2025**

**SC Court of Appeals**



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):

Brian C. Duffy, Esq.  
Wilson Daniel, Esq.  
Jamie A. Khan, Esq.  
Forrest W. Lewis, Esq.  
Jaan G. Rannick, Esq.  
Daniel S. Slotchiver, Esq.

**THE LAW OFFICE OF JESSE SANCHEZ, LLC**

751 Johnnie Dodds Blvd., Suite 200, Mount Pleasant, SC 29464 P: 843.814.8181 F: 843.284.3953  
jesse@jessesanchezlaw.com jessesanchezlaw.com