

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
Nov 06 2025
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master-in-Equity
The Honorable Mikell R. Scarborough

Common Pleas Case No.: 2023-CP-10-00192
Appellate Case No.: 2025- 001402

Katie Lynn Mallace and Micah James Mallace,
..... Respondents

v.

Southeastern Capital Corporation; Krista Brown-Penney, Co-Trustee, EM Family Trust; and John Doe and Mary Roe, representing all unknown persons having or claiming to have any right, title, or interest in or to, or lien upon, the real estate described as a portion of Third Street shown on a plat recorded in the Office of the RMC for Charleston County in Plat Book D at Page 180, Charleston County, South Carolina, TMS# 999-00-00-366 formerly known as TMS# 514-09-00-047, their heirs and assigns, and all other persons, firms, or corporations entitled to the claim under, by or through the abovenamed Defendant(s), and all other persons or entities unknown claiming any right, title, interest, estate in, or lien upon, the real estate described as a portion of Third Street shown on a plat recorded in the Office of the RMC for Charleston County in Plat Book D at Page 180, Charleston County, South Carolina, TMS# 999-00-00-366 formerly known as TMS# 514-09-00-047, Defendants,

of which EM Family Trust, David M. Bolach, and Terri Davis are
the.....Appellants.

**APPELLANTS' EM FAMILY TRUST, DAVID M. BOLACH AND TERRI DAVIS
EMERGENCY MOTION FOR EXTENSION OF TIME TO
FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF
MATTER**

Pursuant to the South Carolina Court of Appeals Rules, Appellants EM Family Trust,
David M. Bolach, and Terri Davis (“Appellants”), by and through undersigned counsel, hereby

moves the Court for an order granting Appellants a thirty (30) day extension of time, until December 9, 2025, in which to file and serve Appellant's Initial Brief and Designation of Matter. Appellant would submit that this extension is necessary due to counsel's current case load. The deadline has not previously been extended.

November 5, 2025
North Charleston, South Carolina

FERRARA LAW FIRM, PLLC
/s Paul B. Ferrara, III
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Paul B. Ferrara, III*
Janel K. Ferrara*

November 5, 2025

SENT VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

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Nov 06 2025
SC Court of Appeals

Re: Katie Lynn Mallace v. EM Family Trust
Appellate Case No. 2025-001402
Our File No.: 23-515

Dear Ms. Kitchings:

Please find enclosed the emergency motion for extension of time to file and serve initial brief and designation of matter, along with a check in the amount of Fifty (\$50.00) Dollars. Please file the proposed order and return a stamped copy to our office in the self-addressed envelope.

Do not hesitate to contact our office with any questions or concerns.

FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III