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Dec 08 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
H. Steven DeBerry, IV, Circuit Court Judge

Appellate Case No.: 2025-000818

Paul Vernon Coffman, Jr.,..... Respondent,

vs.

Town of Port Royal, Appellants.

MOTION FOR EXTENSION

Pursuant to Rules 240 and 263(b), SCACR, Respondent Paul V. Coffman, Jr. respectfully requests an extension of the deadline to file and serve Respondent’s Brief and Designation of Additional Matter. The current deadline is December 8, 2025. Respondent seeks a 15 day extension to file and serve the brief. The Court has extended this deadline twice already and announced no further extensions will be granted absent extraordinary circumstances. Counsel presents the following for the Court’s consideration:

1. The undersigned counsel experienced a medical circumstance which required a previously unscheduled ultrasound on Monday, December 8, 2025, following a doctor’s visit on December 4, 2025.
2. On Thursday, November 20, 2025, Judge Keith Kelly, who has been assigned to preside over the case of *Beach v. Parkers, etc.*, 2021-CP-25-00392, scheduled an all-day hearing

in Spartanburg, South Carolina for Wednesday, November 26, 2025, to address a number of pending motions. The undersigned is co-counsel for the Plaintiffs, and had to prepare for the hearing. The Defendants filed numerous additional motions and matters for Judge Kelly to consider on Tuesday, November 25, 2025, which required immediate attention for a response. Judge Kelly requested responses to a number of the items, which required counsel to shift focus to those items.

3. Respondent has consulted with Appellant's counsel, who consents to this request.

Respectfully submitted,

/s/ John S. Nichols

John S. Nichols (SC Bar #4210)
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Attorney for Respondent

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vs.

Town of Port Royal, Appellants.

PROOF OF SERVICE

I certify that I have served a copy of the *Motion for Extension* for the Respondent upon Appellants' counsel's primary email addresses listed in the Attorney Information System as follows:

Andrew Lindemann
Lindemann Law Firm, P.A.
andrew@ldlawsc.com

Thomas Allan Bendle, Jr.
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Kalen Reed
Paralegal to John S. Nichols, Esq.

December 8, 2025

cc: John@bluesteinattorneys.com (John S. Nichols)
thad@thadmeyerspa.com (Thad L. Myers)
jj@thadmeyerspa.com (Jeremiah J. Shellenberg, II)
josh@joshgolsonlaw.com (Josh P. Golson)
glp@pattersonlawoffices.net (Grady L. Patterson, III)

December 8, 2025

VIA EMAIL ONLY- ctappfilings@sccourts.org

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
Dec 08 2025
SC Court of Appeals

RE: Paul Vernon Coffman, Jr. vs. Town of Port Royal
Appellate Case No.: 2025-000818

Dear Ms. Kitchings,

Please find enclosed for filing a *Motion for Extension* for the Respondent, in reference to the above matter. I have enclosed a proof of service of this document to the Appellants' counsel.

A check in the amount of \$50.00 has been placed in USPS mail to be delivered within five (5) business days.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kalen Reed
Paralegal to John S. Nichols, Esq.

/knr

Enclosures

cc: john@bluesteinattorneys.com (John S. Nichols)
thad@thadmeyerspa.com (Thad L. Myers)
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rdennis@hghpa.com (Robert S. Dennis)
dylan.kidd@bcgov.net (Dylan C. Kidd)

Kalen Reed

From: Kalen Reed
Sent: Monday, December 8, 2025 4:47 PM
To: andrew@ldlawsc.com; tbendle@hgpha.com; rdennis@hgpha.com; dylan.kidd@bcgov.net
Cc: John Nichols; thad@thadmeyerspa.com; jj@thadmeyerspa.com; josh@joshgolsonlaw.com; glp@pattersonlawoffices.net
Subject: Paul Coffman, Jr. v. Town of Port Royal/Case #2025-000818
Attachments: 2025.12.08 Motion for Extension.pdf

Categories: Smokeball

Dear Counsel:

Attached please find and served upon you Respondent's Motion for Extension in the above matter.

Thank you,



KALEN REED PARALEGAL

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