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**Mar 03 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Jocelyn Newman, Circuit Court Judge

The Honorable Patrick C. Fant, III, Circuit Court Judge

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Appellate Case No. 2025-001957  
Lower Court Case No. 2024-CP-42-01687

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Donald Roth, ..... Respondent

v.

The River Bend Sportsman’s Resort, Inc., Riverbend Properties, Inc., Ralph H. Brendle, Paul J. Barnwell, Robert T. Estes, and Paul Lehner, .....Appellants.

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S BRIEF**

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Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for the Respondent respectfully requests an extension of the deadline to file the Respondent’s brief from March 19, 2026, until April 22, 2026. This is the first such request and is made in good faith and not for the purpose of delay. The grounds for this request are that, in light of their schedules and the other demands of their practices, counsel for the Respondent needs additional time to prepare its brief. Counsel for Respondent does not intend to request any further extensions absent extraordinary circumstances. The undersigned consulted with counsel for Appellants, who has no objection to this Motion.

*(Signature Page to Follow)*

*s/ Roni B. Payne*

Fred W. "Trey" Suggs III, SC Bar No. 70222

Roni B. Payne, SC Bar No. 106693

Cassidy Coates Price, P.A.

1052 N. Church Street (29601)

Post Office Box 10529

Greenville, SC 29603

(864) 349-2616

*Attorneys for Respondent*

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**PROOF OF SERVICE**

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I, the undersigned, do hereby state that I have on March 3, 2026, served copies of the **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S BRIEF** upon all other parties, through their attorney(s) of record, via electronic mail using the e-mail addresses listed in the Attorney Information System (AIS). A copy of the sent e-mail is enclosed with this Proof of Service.

*s/ Roni B. Payne*  
\_\_\_\_\_  
Fred W. “Trey” Suggs III, SC Bar No. 70222  
Roni B. Payne, SC Bar No. 106693  
Cassidy Coates Price, P.A.  
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Greenville, SC 29603  
(864) 349-2616

*Attorneys for Respondent*

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Mar 03 2026

SC Court of Appeals

**From:** [Kenneth Anthony](#)  
**To:** [Roni Payne](#)  
**Cc:** [Rebecca Pharr](#); [Cindy Hogan](#)  
**Subject:** RE: Roth v. The River Bend Sportsman's Resort, Inc., et al - Respondents Request for Extension  
**Date:** Monday, March 2, 2026 1:20:08 PM  
**Attachments:** [image001.png](#)

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Of course I have no objection

**From:** Roni Payne <[rpayne@cassidycoates.com](mailto:rpayne@cassidycoates.com)>  
**Sent:** Monday, March 2, 2026 1:00 PM  
**To:** Kenneth Anthony <[kanthony@anthonylaw.com](mailto:kanthony@anthonylaw.com)>  
**Cc:** Rebecca Pharr <[rpharr@cassidycoates.com](mailto:rpharr@cassidycoates.com)>; Cindy Hogan <[chogan@anthonylaw.com](mailto:chogan@anthonylaw.com)>  
**Subject:** Roth v. The River Bend Sportsman's Resort, Inc., et al - Respondents Request for Extension

Caution! This message was sent from outside your organization.

[Report](#)

Ken,

I hope you are doing well. We are requesting an extension to file our response brief through April 22nd. I have attached the motion. I would like to include that appellants' counsel has no objection to our request if you consent. Please let me know if you object.

Thank you!

Roni

**Roni B. Payne**

Attorney

e [rpayne@cassidycoates.com](mailto:rpayne@cassidycoates.com)

d 864.349.2615



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[cassidycoates.com](http://cassidycoates.com)

NOTICE: Never trust wiring instructions sent via email. Cyber criminals are hacking email accounts and sending emails with fake wiring instructions. Always confirm wiring instructions in person or by telephone to a verified phone number.



Rebecca E. Pharr  
[rpharr@cassidycoates.com](mailto:rpharr@cassidycoates.com)  
864-349-2618

March 3, 2026

**RECEIVED**

**Mar 03 2026**

**SC Court of Appeals**

Jenny Abbott Kitchings  
Clerk, The Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: Donald Roth v. The River Bend Sportsman's Resort, Inc., Riverbend Properties, Inc., Ralph H. Brendle, Paul J. Barnwell, Robert T. Estes, and Paul Lehner; C.A. No. 2024-CP-42-01687; CCP No.: 4119.0001**

Dear Madam Clerk:

Enclosed please find the Respondent's Motion for Extension of Time to File the Respondent's Response Brief to be included in Record on Appeal along with the Proof of Service and a check (#60512) for the filing cost associated with this Motion.

Please let me know if you have any questions regarding the enclosed.

Sincerely,

CASSIDY COATES PRICE, P.A.

A handwritten signature in black ink, appearing to read 'Rebecca Pharr'.

Rebecca E. Pharr, Paralegal to  
Fred W. "Trey" Suggs III  
and Roni B. Payne

/rep

Enclosures:

Kenneth Anthony: [kanthony@anthonylaw.com](mailto:kanthony@anthonylaw.com)

Cindy Hogan: [chogan@anthonylaw.com](mailto:chogan@anthonylaw.com)