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Apr 30 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
William C. McMaster, III, Circuit Court Judge

Appellate Case No. 2025-002385
Case No. 2025-CP-23-3365

AJC 101 Holdings, LLC, Appellant,

v.

Greenville County Planning Commission, Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF OF RESPONDENT**

The Respondent Greenville County Planning Commission respectfully moves this Court for an additional 15-day extension of time until May 15, 2026, by which to file and serve their Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

The Respondent’s motion is based on the following grounds:

1. The Respondent’s Initial Brief and their Designation of Matter to be Included in the Record on Appeal are currently due to be filed and served on or before April 30, 2026.
2. The undersigned counsel requires additional time to complete the Initial Brief of Respondent due to other obligations and deadlines, including having a Petition for Rehearing due in

the Court of Appeals on April 30, 2026. Additionally, the undersigned counsel is scheduled for oral argument on May 6, 2026, at the Fourth Circuit Court of Appeals.

3. The undersigned has consulted with counsel for the Appellant, and he consented to the requested extension by reply email. (See attached emails). The Appellant also received multiple extensions with consent from the Court for its Initial Brief.

WHEREFORE, the Respondent Greenville County Planning Commission respectfully requests that it be allowed until May 15, 2026, by which to file and serve its Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN LAW FIRM, P.A.

BY: s/ Andrew F. Lindemann
ANDREW F. LINDEMANN #13030
5 Calendar Court, Suite 102
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920

*Counsel for Respondent Greenville County
Planning Commission*

April 30, 2026

From: [Miles Coleman](#)
To: [Andrew Lindemann](#)
Subject: RE: AJC-101 Holdings, LLC appeal TIME SENSITIVE
Date: Thursday, April 30, 2026 11:07:38 AM

Yes, we consent. Sorry for the delayed response—just finished a CA4 moot and had thus missed emails and calls earlier this morning.

From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Thursday, April 30, 2026 10:05 AM
To: Miles Coleman <miles.coleman@nelsonmullins.com>
Subject: AJC-101 Holdings, LLC appeal TIME SENSITIVE
Importance: High

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Miles:

My Initial Respondent's Brief is due today. I have another Court of Appeals brief due as well. I thought I'd be able to get them both finished, but now I am not too sure. Will you consent to an additional 15-day extension? I believe the Appellant received two 30-day extensions, so I'd appreciate your consent.

Thanks.

Andrew

Andrew F. Lindemann
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CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Respondent, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondent** in the above-captioned matter was made upon all counsel of record by email only this the 30th day of April 30, 2026, as follows:

Luke A. Burke, Esquire
Burke Law, LLC
Email: lburke@gvlattorney.com

Miles E. Coleman, Esquire
Nelson Mullins Riley & Scarborough, LLP
Email: miles.coleman@nelsonmullins.com

s/ Andrew F. Lindemann