

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Jun 10 2026
SC Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas
Hon. Thomas W. McGee, III, Circuit Court Judge

Appellate Case No. 2025-002548
Trial Court Case No. 2023-CP-1200288

Mary Simpson Carpenter Crowder, by and Through
Michael Paul Swearingen, as Special Administrator
for the Estate of Mary Simpson Carpenter Crowder,Appellant,

v.

Cedar Grove Baptist Church, Deacons of Cedar Grove
Baptist Church, a/k/a Cedar Grove Providence Church,
SCBT, and South State Bank,Respondents,

and

Cedar Grove Baptist Church as Third-Party PlaintiffRespondent,

v.

James Wylie Crowder, III, as Third-Party DefendantAppellant.

THIRD MOTION FOR AN EXTENSION OF TIME TO
FILE APPELLANTS' INITIAL BRIEF AND DESIGNATION

Pursuant to Rules 208(a)(1), 240, and 263(b) of the South Carolina Appellate Court Rules, Appellants respectfully request a 30-day extension of time to file their Initial Brief and Designation of Matter to be Included in the Record of Appeal. This is Appellants' third request for an extension of time for this brief. No prejudice will be caused to either party by this extension.

This request is made to extraordinary circumstances involving counsel's conflicting deadlines, medical procedures, and family obligations. The current due date of Appellants' Initial

Brief very nearly coincides with counsel's other deadlines and work obligations, including a petition to the Fourth Circuit Court of Appeals for permission to file an interlocutory appeal in *O.R. et al. v. Greenville County, South Carolina et al.*, Case No. 6:25-cv-02599-DDC (D.S.C.), which cannot be extended, and other filings, including an initial reply brief in *AJC-101 Holdings, LLC v. Greenville County Planning Commission*, No. 2025-002385 (S.C. Ct. App.).

In addition, both of the undersigned attorneys were further impeded by medical events including, for one, a recent oral surgery and, for the other, a multi-day medical treatment for counsel's child that, due to complications, lasted more days than anticipated. These events, respectively, have hindered counsels' ability to prepare and file the initial briefing by the current deadline. So too, both counsel's professional and personal travel obligations in the latter half of June and early July prevent them from seeking herein an extension of fewer than 30 days.

The current deadline for Appellants' Initial Brief and Designation is **June 15, 2026**. According to counsel's calculations, the pending request would make the new deadline **July 15, 2026**. Appellants respectfully request the Court hold the current deadline in abeyance pending the Court's consideration of this Motion.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Miles E. Coleman (SC Bar No. 78264)

E-Mail: miles.coleman@nelsonmullins.com

Mayme Medlock (S.C. Bar No. 106975)

E-Mail: mayme.medlock@nelsonmullins.com

2 W. Washington Street / Fourth Floor

Greenville, SC 29601

(864) 373-2352

Attorneys for Appellants

Greenville, South Carolina
June 10, 2026

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APPEAL FROM CHESTER COUNTY
Court of Common Pleas
Hon. Thomas W. McGee, III, Circuit Court Judge

Appellate Case No. 2025-002548
Trial Court Case No. 2023-CP-12-288

Mary Simpson Carpenter Crowder, by and Through
Michael Paul Swearingen, as Special Administrator
for the Estate of Mary Simpson Carpenter Crowder, Appellant,

v.

Cedar Grove Baptist Church, Deacons of Cedar Grove
Baptist Church, a/k/a Cedar Grove Providence Church,
SCBT, and South State Bank,..... Respondents,

and

Cedar Grove Baptist Church as Third-Party Plaintiff Respondent,

v.

James Wylie Crowder, III, as Third-Party Defendant Appellant.

PROOF OF SERVICE

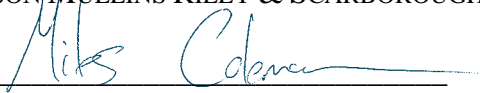
Pursuant to Rule 262(c)(3), SCACR, undersigned counsel hereby certifies that I have served a copy of Appellants’ Third Motion for an Extension of Time to File Appellants’ Initial Brief and Designation on Respondents’ counsel, W. Keith Martens, at the primary e-mail address listed in the Attorney Information System (see attached sent email).

[Signature page attached]

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

By:



Miles E. Coleman

SC Bar No. 78264

E-mail: miles.coleman@nelsonmullins.com

Mayme E. Medlock

SC Bar No. 106975

E-mail: mayme.medlock@nelsonmullins.com

2 W. Washington Street \ Suite 400

Greenville, SC 29601

(864) 373-2300

Attorneys for Appellants

June 10, 2026

Greenville, South Carolina

Miles Coleman

RECEIVED

From: Miles Coleman
Sent: Wednesday, June 10, 2026 1:42 PM
To: keith.martens@hamiltonmartens.com
Cc: Mayme Medlock
Subject: Crowder v. Cedar Grove Baptist -- service of third motion for extension
Attachments: 2026.06.10 -- Crowder v. Cedar Grove Baptist Church -- Third Motion for Extension of Time to File Initial Brief.pdf

Jun 10 2026

SC Court of Appeals

Keith, please find attached for electronic service a copy of Appellants' third motion for an extension of time, which we'll be filing with the court shortly.

Regards,

Miles



MILES COLEMAN **PARTNER**

miles.coleman@nelsonmullins.com

GREENVILLE ONE | SUITE 400

2 W. WASHINGTON STREET | GREENVILLE, SC 29601

T 864.373.2352 F 864.373.2925

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