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Jun 26 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
CIRCUIT COURT

DeAndrea Gist Benjamin, Circuit Court Judge
Case No. 2019-CP-40-00919

Appellate Case No. 2022-001434

Emad Tadros, as Trustee of the Grace Living Trust dated October 12, 2010, as amended.....Appellant,

v.

Holder Properties, Inc., John R. Holder, Individually, ADESSO/Columbia, LLC, ADESSO Horizontal Property Regime, and ADESSO Homeowners' Association, Defendants,

of which

ADESSO/Columbia, LLC, ADESSO Horizontal Property Regime, and ADESSO Homeowners' Association ,.....Respondents.

MOTION TO FILE OUT OF TIME

Appellant hereby moves to file its Record on Appeal out of time and to accept the response being filed contemporaneously with this motion as timely. This motion is based on counsel for appellant's busy deposition and motions schedule and previously planned days off.

SIGNATURE TO FOLLOW ON NEXT PAGE

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

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Attorney for Appellant

Columbia, South Carolina

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ADESSO/Columbia, LLC, ADESSO Horizontal Property Regime, and ADESSO Homeowners' Association ,.....Respondents.

PROOF OF SERVICE

I certify that I have served a copy of **Appellant's Motion to File Out of Time and Record on Appeal**, on the following via email address on June 26, 2026.

Larry D. Cohen, Esquire Larry D. Cohen, LLC ldcohen@ldcohenlaw.com	Carolyn H. Blue, Esquire carolyn.blue@ymail.com
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June 26, 2026

VIA E-FILING AND MAIL - ctappfilings@sccourts.org

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

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SC Court of Appeals

RE: *Emad Tadros, M.D. v. Holder Properties, Inc.*
Appellate Case No.: 2022-001434
Our File No.: 4000-0007

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion to File Out of Time and Record on Appeal Volumes I-III, along with a Proof of Service, for filing in connection with the above-referenced matter. Please return a copy of same via email once filed. A check with the filing fee has been placed in the mail.

As evidenced by the Proof of Service, I have served all interested parties, with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Douglas W. Mackelcan, Esquire
Skyler C. Wilson, Esquire
Emad Tadros