

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Sep 16 2026
SC Court of Appeals

APPEAL FROM THE GREENVILLE COUNTY
COURT OF COMMON PLEAS

The Honorable Vernon F. Dunbar

Case No. 2021-CP-23-04836

Thomas J. Stultz, Lecia S. Franklin, and Frederick Hanold, III,

Respondents,

v.

Rallis Holdings, LLC,

Appellant.

**CONSENT MOTION FOR SECOND EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant Rallis Holdings, LLC hereby respectfully requests an enlargement of time by an additional thirty (30) days in which to file his initial brief and designation of matter in this case. The basis for this motion is as follows:

1. This is an appeal from the Greenville County Court of Common Pleas concerning the trial court's striking of Appellant's answer as a sanction for purported discovery abuse. Appellant, who was the defendant in the proceedings below, appealed from the trial court's orders on April 22, 2026. In its notice of appeal, Appellant stated that it had ordered the relevant transcripts and would notify the Court upon their receipt.

2. On July 22, 2026, Appellant filed correspondence with the Court informing it that all relevant transcripts had been received as of July 15, 2026. Pursuant to Rule 208(a)(1), SCACR,

Appellant's initial brief and designation of matter were therefore initially due on Friday August 14, 2026, which was 30 days following Appellant's receipt of the transcript.

3. On August 11, 2026, Appellant moved for a thirty-day extension of time in which to submit its initial brief and designation of matter. In support, Appellant represented that counsel's prior and ongoing obligations—to include appellate briefing in this Court in a different case, a pre-planned family vacation, and other immediate and upcoming professional obligations—had hampered his ability to complete Appellant's initial brief in this matter. On August 12, 2026, the Court granted Appellant's motion and extended the time in which to file Appellant's initial brief and designation of matter to September 21, 2026.

4. Appellant now respectfully requests an additional thirty days in which to submit its initial brief and designation of matter in this appeal, up to and including October 21, 2026. In support, Appellant states that it requires additional time in which to compile the initial brief and designation of matter in this case, which concerns events that took place over four-and-a-half years and involved voluminous productions of documents, a significant amount of correspondence and discovery requests and responses exchanged between the parties, and several motions and motions hearings, much of which is relevant to this appeal. Appellant requires additional time to compile these materials in light of counsel's continuing obligations in other cases, which include recent and upcoming briefing to this Court in two other appeals, an upcoming trial date and pre-trial filings in a case pending in federal district court, and depositions and other time-sensitive tasks which require counsel's efforts in the next several days. Appellant does not anticipate seeking any additional extensions of this deadline, and respectfully asks that the Court grant this second extension of the initial brief deadline.

5. The undersigned counsel has conferred with counsel for the Respondents concerning this request. Respondents consent to the relief requested herein.

WHEREFORE, Appellant respectfully requests an additional thirty (30) days, up to and including October 21, 2026, in which to file its initial brief and designation of matter in this appeal.

Respectfully submitted,

s/ Andrew R. Hand

Richard A. Harpootlian, SC Bar No. 2725

Andrew R. Hand, SC Bar No. 101633

RICHARD A. HARPOOTLIAN, P.A.

1410 Laurel Street (29201)

Post Office Box 1090

Columbia, South Carolina 29202

(803) 252-4848

rah@harpootlianlaw.com

arh@harpootlianlaw.com

Attorneys for Appellant Rallis Holdings, LLC

September 16, 2026
Columbia, South Carolina.

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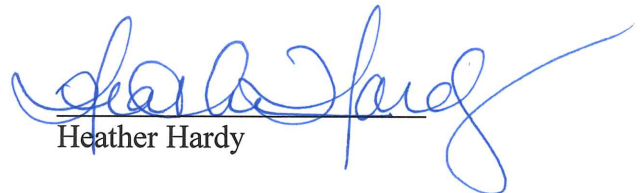
Appellant.

CERTIFICATE OF SERVICE

I, Heather Hardy, Paralegal to Richard A. Harpootlian, P.A., located at 1410 Laurel Street, Columbia, South Carolina 29201, hereby certify that on September 16, 2026, did serve via e-mail, the following documents on counsel listed below.

Document: **Consent Motion for Second Extension of Time to File Initial Brief and Designation of Matter**

Served: Bruce W. Bannister
Ryan W. Pasquini
BANNISTER, WYATT & STALVEY, LLC
24 Cleveland Street, Suite 100
Greenville, South Carolina 29601
bbannister@bannisterwyatt.com
rpasquini@bannisterwyatt.com
Attorneys for Respondents


Heather Hardy



HARPOOTLIAN
ATTORNEYS AT LAW

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Richard A. Harpootlian
rah@harpootlianlaw.com

Phillip D. Barber
pdb@harpootlianlaw.com

Andrew R. Hand
arh@harpootlianlaw.com

Jamie L. Harpootlian
Of Counsel
Admitted in Louisiana

September 16, 2026

Ms. Jenny Abbot Kitching, Clerk of Court
SC Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org

In re: Thomas J. Stultz v. Rallis Holdings, LLC
Appellate Case No. 2026-000999

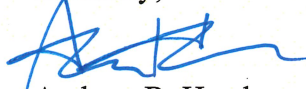
Dear Ms. Kitchings:

Enclosed please find a consent motion for extension of time to file initial brief and designation of matter for filing. The required filing fee will be mailed to the court.

Thank you for your assistance in this matter.

With warm regards, I am

Sincerely,



Andrew R. Hand

/hmh
enclosure
cc: All counsel of record