

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas
Mikell Scarborough, Master-in-Equity

Appellate Case No. 2026-000649
Circuit Court Case No. 2024-CP-10-02016

Calfran Properties,
A South Carolina Limited Partnership,

Respondent,

v.

Thomas D. Calcote,

Appellant.

**CONSENT MOTION FOR EXTENSION OF TIME TO SEPTEMBER 25, 2026,
TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT**

CLEMENT RIVERS, LLP
Edward D. Buckley, Jr. (SC Bar No. 994)
John P. Carr (SC Bar No. 106671)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorneys for Respondent

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Sep 17 2026
SC Court of Appeals

NOW COMES Respondent, Calfran Properties, A South Carolina Limited Partnership, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, **with the consent of Appellant, Thomas D. Calcote**, and, on the grounds set forth below, hereby moves this Honorable Court to extend the deadline for serving and filing the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal to Friday, September 25, 2026.

Currently, pursuant to this Court's order filed August 19, 2026, Respondent's initial brief and corresponding designation of matter are due to be served and filed today, September 17, 2026, and indeed, Respondent's undersigned counsel expected to be able to have completed Respondent's initial brief by this date. Because of other work- and non-work-related time commitments (including the need to devote extra attention to time-sensitive matters in another case and family obligations away from the office/out of town), however, Respondent's undersigned counsel remains in need of a modest amount of time to finish preparation of Respondent's initial brief. Consequently, Respondent's undersigned counsel inquired of Appellant's counsel, John E. Robinson, Esquire, whether he would consent to an extension of Respondent's initial briefing deadline to Friday, September 25, 2026, and Mr. Robinson has kindly authorized Respondent's undersigned counsel to advise the Court that he consents. Accordingly, Respondent's undersigned counsel most respectfully submits that good and sufficient cause exists to extend the deadline for Respondent's initial brief and designation of matter to Friday, September 25, 2026, such relief being a reasonably modest dispensation and the granting thereof being in the interests of justice, not prejudicial to Appellant, and indeed consented to by Appellant.

WHEREFORE, Respondent asks the Court to extend the deadline for serving and filing the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the

Record on Appeal to Friday, September 25, 2026, and to hold such deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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Attorneys for Respondent

Charleston, South Carolina

September 17, 2026

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Calfran Properties,
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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Respondent

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that, on September 17, 2026, the **CONSENT MOTION FOR EXTENSION OF TIME TO SEPTEMBER 25, 2026, TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT** was served on Appellant by emailing (see attached email) a copy of the same to counsel of record:

LAW OFFICES OF JOHN E. ROBINSON, LLC

John Edward Robinson, Esquire

john@charlestonlawoffices.com

Attorney for Appellant

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Respondent

Charleston, South Carolina

September 17, 2026

Hines, Russell

From: Hines, Russell
Sent: Thursday, September 17, 2026 3:27 PM
To: 'john@charlestonlawoffices.com'
Cc: paralegal2@charlestonlawoffices.com; Buckley, Edward D. (Ed); Carr, John; Justman, Aimee; Mammoser, Amanda; Construction Calendar
Subject: Calfran v. Calcote (2026-000649) -- Consent Motion for Briefing Extension to 9-25-26
Attachments: Calfran v. Calcote (2026-000649) -- Consent Motion for Briefing Extension to 9-25-26.pdf

Attached for service in the above-referenced matter please find the **Consent Motion for Extension of Time to September 25, 2026, to Serve and File Initial Brief of Respondent.**

Thanks again, John.

Russ

Russell G. Hines
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