

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

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Aug 10 2020

SC Court of Appeals

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

The Hon. Deadra L. Jefferson, Circuit Court Judge

Case No. 2016-CP-10-2955

Appellate Case No. 2020-000875

TCC of Charleston, Inc.Plaintiff/Respondent

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, 304 Concord & Cumberland, LLC, Marion M. Simpson, f/k/a/ Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, Bonita K. Levin, Donald D. Leonard, Beby L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas, R. Debnam.....Defendants

Of Which Concord & Cumberland HPR is theAppellant

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE REPLY TO
MOTION TO DISMISS APPEAL**

COMES NOW the above-named Respondent, pursuant to Rules 240 and 263(b), S.C.A.C.R., moving this Court for an Order extending the time for filing and serving a Reply to Return to the Motion to Dismiss Appeal which has served on Respondent on August 7, 2020, and is currently due on or before August 12, 2020. This is Respondent’s first request for an

extension. The undersigned respectfully requests an extension of time of five (5) days through August 17, 2020 for filing and serving its Reply to the Return to the Motion to Dismiss Appeal.

Counsel for Respondent would show that there is good cause to allow the requested extension of time, as it is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party.

Respectfully submitted,

EPTING & RANNIK

This 10th day of August, 2020
Charleston, S.C.

/s/ Jaan Rannik
Jaan G. Rannik, Esquire
46A State Street,
Charleston, SC 29401
P: (843) 377-1871
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ATTORNEY FOR RESPONDENT

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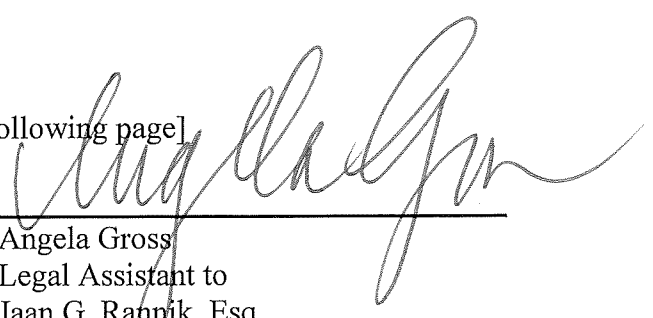
Of Which Concord & Cumberland HPR is theAppellant

PROOF OF SERVICE

I certify that I have served Respondent’s Motion for Extension of Time to File Reply to Motion to Dismiss Appeal on opposing counsel via e-mail, on August 10, 2010, addressed to Appellant’s attorney of record, **Cordes Ford, Esq., at Cordes.Ford@wbd-us.com.** A copy of the e-mail is attached to this Proof of Service as Exhibit A.

[Signature of following page]

By



Angela Gross
Legal Assistant to
Jaan G. Rannik, Esq.
46A State Street, Charleston, SC 29401
Phone: 843-377-1871; Fax: 843-377-1310

Angela Gross

From: Angela Gross
Sent: Monday, August 10, 2020 3:38 PM
To: Ford, Cordes; Jaan Rannik; Buckley, Edward D. (Ed)
Cc: Walden, Andrew; Andrew K. Epting; Daigle, Jason; Grimbball, Henry
Subject: TCC of Charleston v. Concord and Cumberland / Appeal No. 20-000875
Attachments: 2020 08 10 - Ltr to Ct. App enc motion filing fee.pdf; 2020 08 10 -Motion for Extension of Time (TCC v. Concord - App. No. 20-000875).pdf

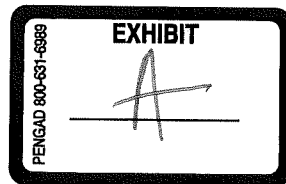
Counselors:

Attached for service please find Respondent's Motion for an Extension of Time to file Reply to Motion to Dismiss Appeal in the above-matter which will be filed with the SC Court of Appeals through the AIS e filing system this afternoon.

Angela

Angela Gross
Legal Assistant to Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire
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EPTING & RANNIK, LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

August 10, 2020

The South Carolina Court of Appeals
Jenny Abbott Kitchings
Clerk of Court
P.O. Box 11629
Columbia, SC 29211

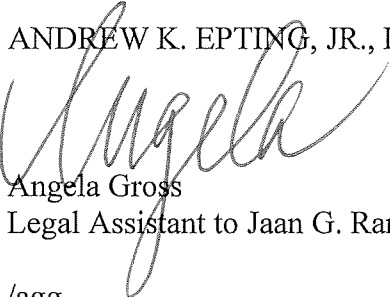
RE: *TCC of Charleston, Inc. v. Concord & Cumberland HPR*
Appellate Case No.: 2020-000875

Dear Ms. Kitchings:

Enclosed please find our firm's check in the amount of \$50.00 as payment of the motion fee associated with Respondent's Motion for an Extension of Time to File Reply to Motion to Dismiss which was submitted today using the AIS e-filing system in the above-referenced appeal.

With kindest regards,

ANDREW K. EPTING, JR., LLC



Angela Gross
Legal Assistant to Jaan G. Rannik, Esq.

/agg

Enclosure as stated

cc: F. Cordes Ford, IV, Esq.
Henry E. Grimbball, Esq.
Robert Andrew Walden, Esq.