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Apr 28 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas, Business Court Program

R. Lawton McIntosh, Circuit Court Judge

Case No. 2019-CP-23-00998

McMillan Pazdan Smith, LLC, Plaintiff/Counterclaim Defendant-Respondent,

v.

Donza H. Mattison, Defendant/Counterclaimant-Appellant,

Donza H. Mattison, in a Derivative
Capacity on Behalf of McMillan Pazdan
Smith, LLC, Third-Party Plaintiff-Appellant,

v.

Rondald G. Smith, Joseph M. Pazdan,
Brad B. Smith, and Chad C. Cousins Third-Party Defendants-Respondents.

APPELLANT’S UNOPPOSED MOTION FOR LEAVE TO EXCEED
PAGE LIMITATION FOR INITIAL REPLY BRIEF

Appellant, Donza H. Mattison, by and through her undersigned counsel, hereby files this Unopposed Motion for Leave to Exceed Page Limitation for Initial Reply Brief. Appellant seeks to increase the 25-page limit on her Initial Reply Brief, as provided in Rule 208(b)(5), SCARC, by five pages to 30 pages. The extra space is needed for Appellant to respond to two additional sustaining grounds raised by Respondents in their Initial Brief, which were unanticipated by Appellant.

Appellant's counsel has conferred with Respondents' counsel about this matter, and Respondents' counsel has indicated that Respondents have no objection to the request for additional pages.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David E. Rothstein", written over a horizontal line.

David E. Rothstein, SC Bar No. 66295

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Attorney for Appellant

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PROOF OF SERVICE

I certify that I have served Appellant's Unopposed Motion for Leave to Exceed Page Limitation for Initial Reply Brief on Respondents, McMillan Pazdan Smith, LLC, Rondald G. Smith, Joseph M. Pazdan, Brad B. Smith, and Chad C. Cousins, by depositing this motion in the United States Mail, postage prepaid, on April 28, 2021, addressed to their following attorneys of record: Samuel W. Outten and Miles Coleman, Nelson Mullins Riley & Scarborough LLP, 2 W. Washington St., Suite 400, Greenville, SC 29601; Thomas H. Keim, Jr., Ford Harrison, 100 Dunbar St., Suite 300, Spartanburg, SC 29306; and A. Mattison Bogan, Nelson Mullins Riley & Scarborough, LLP, 1320 Main St., 17th Floor, Columbia, SC 29201.

[Signature of Counsel on Following Page]

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