

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

**RECEIVED**

**Jul 09 2021**

**SC Court of Appeals**

Appeal from Charleston County  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge  
Mikell R. Scarborough, Circuit Court Judge

Case No. 2016-CP-10-02955  
Appellate Case No. 2021-000272

TCC of Charleston, Inc.,

Appellant/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, Edward T. Strom, 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, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

**MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL BRIEF OF RESPONDENT**

CLEMENT RIVERS, LLP

Edward D. Buckley, Jr. (SC Bar No. 994)

W. Siau Barr, Jr. (SC Bar No. 76353)

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 Betty L. Beatty*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent, Betty L. Beatty, by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed June 11, 2021, the deadline for Respondent Betty L. Beatty's initial brief and designation of matter is July 12, 2021. On account of work-related and other time commitments, Respondent Betty L. Beatty respectfully requests that this deadline be extended by 30 days (from July 12, 2021), i.e., through August 11, 2021. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon all other parties to this appeal.

WHEREFORE, Respondent moves this Honorable Court to grant her an additional extension of 30 days' time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving her initial brief and designation of matter would be August 11, 2021, according to the undersigned's calculations. Further, Respondent respectfully requests that the Court holds her present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully Submitted,

CLEMENT RIVERS, LLP

By: 

Edward D. Buckley, Jr. (SC Bar No. 994)

W. Siau Barr, Jr. (SC Bar No. 76353)

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 Appellants*

Charleston, South Carolina

July 9, 2021

**RECEIVED**

**Jul 09 2021**

**SC Court of Appeals**

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

---

Appeal from Charleston County  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge  
Mikell R. Scarborough, Circuit Court Judge

---

Case No. 2016-CP-10-02955  
Appellate Case No. 2021-000272

---

TCC of Charleston, Inc.,

Appellant/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, Edward T. Strom, 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, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

---

**PROOF OF SERVICE**

---

CLEMENT RIVERS, LLP  
Edward D. Buckley, Jr. (SC Bar No. 994)  
W. Siau Barr, Jr. (SC Bar No. 76353)  
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 Betty L. Beatty*

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Respondent Betty L. Beatty, do hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT L** was served on all other parties to this matter on July 9, 2021, via email (see attached) to their counsel of record:

Jaan G. Rannik, Esquire  
Epting & Rannik, LLC  
46A State Street  
Charleston, SC 29401  
jgr@epting-law.com

*and*

Michelle N. Endemann, Esquire  
497 St. Andrews Blvd.  
Charleston, SC 29407  
mendemann@clarksonwalsh.com

*Attorneys for Appellant/Respondent*

F. Cordes Ford IV, Esquire  
Cordes.Ford@wbd-us.com  
Henry E. Grimbball, Esquire  
Henry.Grimball@wbd-us.com  
Robert Andrew Walden, Esquire  
Andrew.Walden@wbd-us.com  
Womble Bond Dickinson (US) LLP  
P.O. Box 999  
Charleston, SC 29402

*Attorneys for Respondent/Appellant*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)

*Attorneys for Respondent Betty L. Beatty*

Charleston, South Carolina

July 9, 2021

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, July 9, 2021 3:02 PM  
**To:** Jaan Rannik (jgr@epting-law.com); 'mendemann@clarksonwalsh.com'; 'Cordes.Ford@wbd-us.com'; 'Henry.Grimball@wbd-us.com'; 'Andrew.Walden@wbd-us.com'  
**Cc:** Buckley, Edward D. (Ed); Barr, Jr., W. Siau; DeMato, Amanda; Hines, Russell; Justman, Aimee  
**Subject:** Appellate Case No. 2021-000272; TCC of Chas. v. Concord & Cumberland  
**Attachments:** Mtn for Ext to File & Serve Initial Brief of Respondent.pdf

Good afternoon, attached please find a Motion for Extension of Time to File/Serve Initial Brief of Respondent in the above-referenced matter which will be filed today.

Thank you,  
Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 500 • Charleston, SC 29401  
FOR COUNSEL