

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

**RECEIVED**

**Nov 12 2021**

**APPEAL FROM CHARLESTON COUNTY**  
Court of Common Pleas for the Ninth Circuit

**SC Court of Appeals**

The Honorable Mikell Scarborough, Master in Equity

Case No. 2016-CP-10-2955

Appellate Case No. 2021-000272

TCC of Charleston, Inc. .... *Plaintiff and 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, . . . . . *Defendants and Respondents/Appellants*

**APPELLANT/RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE AND  
SERVE FINAL BRIEFS AND RECORD ON APPEAL**

COMES NOW the above-named Appellant/Respondent, pursuant to Rules 240 and 263(b), SCACR, moving this Court for an Order extending the time for filing and serving its Final Brief, Final Reply, and Record on Appeal, which are currently due on or before November 16, 2021. This is Respondent’ first request for an extension.

The undersigned respectfully requests an extension of time of thirty (30) days through December 16, 2021, for filing and serving its final briefs and Record on Appeal.

Counsel for Appellant/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 12<sup>th</sup> day of November, 2021  
Charleston, S.C.

/s/ Jaan Rannik  
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