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**Jun 23 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
Bentley Price, Circuit Court Judge

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Case No. 2021-CP-08-00513  
Appellate Case No.: 2021-000768

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Aracelis Santos, .....Appellant,

vs.

Harris Investment Holdings, L.L.C.  
City of Hanahan,  
City of Hanahan Police Department,  
John Doe #1 and John Doe #2  
Employees of the City of Hanahan Police Department, .....Defendants,

of which

Harris Investment Holdings, L.L.C. is the.....Respondent.

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APPELLANT’S MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS

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June 23, 2021

/s/ Thomas R. Goldstein  
Thomas R. Goldstein, S. C. Bar No. 2186  
Belk, Cobb, Infinger & Goldstein, P.A.  
P. O. Box 71121  
N. Charleston, South Carolina 29415-1121  
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ATTORNEYS FOR APPELLANT

Pursuant to Rule 240, *South Carolina Appellate Court Rules*, Appellant moves for an Order of the Court authorizing her either to exceed the 25-page limit on Reply Briefs by 2 pages, or, in the alternative, file an Amended Reply Brief. This motion is based on the following grounds:

On June 17, 2020 Appellant filed her 27-page initial reply brief. The brief is 30 pages long, but the 30-page computation includes the cover page, table of contents, and table of authorities, which 3 pages should not be counted against the 25-page limit of Rule 208(b)(5), *South Carolina Appellate Court Rules*. (Because of age, lack of technical dexterity, resistance to change, and possibly some laziness, Appellant's counsel has failed, to date, to master the technique of separately numbering the cover page, *etc.* to avoid running afoul of the rule, a deficiency the present matter compels counsel to address.) Because the Appellant's Initial Reply Brief exceeds the 25-page limit by 2 pages (excluding cover page, table of contents, and table of authorities), Appellant moves for an Order of the Court granting Appellant alternative relief in one of the following two methods of correction:

- A) Allowing Appellant's June 17, 2022, Initial Reply Brief to remain filed as is by granting leave of Court to exceed the 25-page limitation by 2 pages as permitted by Rule 208(b)(5), *South Carolina Appellate Court Rules* ("On motion, the appellate court may grant a party permission to exceed those limitations"), or
- B) Allowing the Appellant 10 days to re-file the Initial Reply Brief as amended to bring the amended Reply Brief to come within the 25-page limitation.

Respectfully submitted,

June 22, 2021

/s/ Thomas R. Goldstein  
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## CERTIFICATE OF CONSULTATION

I certify that prior to filing this motion, I consulted with opposing counsel who has no objection to the request to exceed page limitation.

June 23, 2021

/s/ Thomas R. Goldstein  
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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
Bentley Price, Circuit Court Judge

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Case No. 2018-CP-08-00266 & 2018-CP-08-01008  
Appellate Tracking No.: 2019-00169

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Aracelis Santos, ..... Appellant,

vs.

Harris Investment Holdings, L.L.C.  
the City of Hanahan, John Doe #1 and  
John Doe #2 .....Defendants,

of whom

Harris Investment Holdings, L.L.C. is .....Respondent.

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PROOF OF SERVICE

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I certify that I have served the Motion to Exceed Page Limitations upon the Respondent, Harris Investment Holdings, L.L.C., by depositing a copy of it in the United States Mail, postage prepaid, on June 23, 2022, addressed to the attorneys of record for the Harris Investment Holdings, L.L.C., Merritt Abney, 151 Meeting Street, Sixth Floor, Charleston, S. C. 29401-2239 (and to counsel for the City of Hanahan, *et. al.*, by depositing a copy of it in the United States Mail, postage prepaid the same date to Stafford J. McQuillin, III at P. O. Box 340, Charleston, S. C. 29402).

June 23, 2022

/s/ Thomas R. Goldstein  
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Hon. Jenny A. Kitchings,  
Clerk of Court  
S. C. Court of Appeals  
P. O. Box 11629  
Columbia, S. C. 29211

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**SC Court of Appeals**

Re: Aracelis Santos v. Harris Investment Holdings, L.L.C., *et. al.*  
Case Nos.: 2018CP-08-00266, 2018-CP-08-01008, & 2021-CP-08-00513  
Tracking Numbers: 2019-001169 & 2021-000768

Dear Ms. Kitchings,

I enclose Appellant's two motions: one to allow the Appellant leave to file a 27-page Reply Brief in Case No. 2021-00768 and a second motion to consolidate two appeals, 2019-001169 and 2021-000768. I also enclose our firm's check in the amount of \$100.00 to cover the filing fees for these two motions. By copy of this letter, I am providing a copy to opposing counsel. I thank you in advance for your attention to this request. With kind regards, I am

Very truly yours,

BELK, COBB, INFINGER & GOLDSTEIN, P.A.  
Thomas R. Goldstein

TRG/

enclosure: Motion for leave to exceed page limitation; Motion to consolidate appeals;  
check No. 19970

cc:

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Sixth Floor  
Charleston, S. C. 29401  
Stafford J. McQuillin, Esq.