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Aug 24 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master in Equity

Case No. 2019-CP-10-4053

Blind Acre, Inc., Respondent-Appellant,

v.

Stash Storage Holdings, Inc., Appellant-Respondent.

**APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S MOTION
REQUESTING PERMISSION TO SERVE AND FILE ITS BRIEF IN RESPONSE TO
RESPONDENT-APPELLANT BLIND ACRE INC.'S CROSS APPEAL**

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Attorney for the Respondent-Appellant

Appellant-Respondent Stash Storage Holdings, Inc. (“Stash”) moves this Court for permission to serve and file its response to Respondent-Appellant Blind Acre, Inc.’s (“Blind Acre”) Initial Brief outside of the deadlines set by Rules 208 and 209, *SCACR*. This is Stash’s second request for an extension in this case and first request as it relates to this filing. Stash states as follows in further support of its Motion:

Stash initiated this appeal on January 28th, 2022. Blind Acre filed its Notice of Appeal for its Cross-Appeal on February 2nd, 2022. Blind Acre served its Initial Brief in its cross-appeal via email on July 21st, 2022. Due to a calendaring mix-up, counsel for Stash failed to file its Initial Brief in response to Blind Acre’s cross-appeal in time for the August 22, 2022 filing deadline. Stash’s Initial Brief in response to Blind Acre’s cross-appeal is being filed simultaneously herewith. As such, no identifiable prejudice has been caused by the late filing. Stash respectfully requests that the Court consider its response Brief, filed simultaneously herewith, despite the late filing.

Respectfully submitted,

s/ Alexandra Scott Williams

Benjamin A.C. Traywick, SC Bar #74027

Alexandra Scott Williams, SC Bar #102862

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August 24, 2022

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PROOF OF SERVICE

I hereby certify that on **August 24, 2022** a true and correct copy of the **APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S MOTION REQUESTING PERMISSION TO SERVE AND FILE ITS BRIEF IN RESPONSE TO RESPONDENT-APPELLANT BLIND ACRE INC.'S CROSS APPEAL** was served via email on all counsel of record as follows:

G. Rutledge DuRant (SC Bar #: 73944)
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By: s/ Alexandra Scott Williams
Attorney for Appellant Stash Storage Holdings, Inc.



Williams O'Neill, Alexandra <ali@bentraywicklaw.com>

Blind Acre, Inc. v. Stash Storage Holdings, Inc. - Appellate Case No. 2022-000103

Alexandra O'Neill <ali@bentraywicklaw.com>

Wed, Aug 24, 2022 at 12:20 AM

To: Christina Sojourner <christina@riesendurant.com>, Rutledge DuRant <rutledge@riesendurant.com>

Cc: "Traywick, Ben" <ben@bentraywicklaw.com>, Teresa Cassaro <teresa@bentraywicklaw.com>

Rutledge-

Attached for service upon you please find:

1. APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S MOTION REQUESTING PERMISSION TO SERVE AND FILE ITS BRIEF IN RESPONSE TO RESPONDENT-APPELLANT BLIND ACRE INC.'S CROSS APPEAL
2. APPELLANT-RESPONDENT STASH STORAGE HOLDINGS, INC.'S RESPONSE BRIEF TO RESPONDENT-APPELLANT'S INITIAL BRIEF
3. DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL
4. DESIGNATED MATERIALS
5. PROOF OF SERVICE

We will be filing the same with the Court via email.

Thank you,
Ali



Alexandra Scott Williams O'Neill, Esquire

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5 attachments

-  **22.08.24 Stash Storage DOM with Response Brief.pdf**
59K
-  **22.08.24 Stash Motion for Permission to File and Serve Initial Response Brief.pdf**
118K
-  **22.08.24 PROOF OF SERVICE- Stash Response Brief & DOM.pdf**
46K
-  **22.08.24 Stash RESPONSE BRIEF to Blind Acre Cross-Appeal.pdf**
207K
-  **Blind Acre Hearing Exh 3 Invoices (from Rutledge post initial briefs).pdf**
3039K

