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**Nov 11 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

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Case No.: 2018-CP-10-4083

Appellate Tracking No.: 2022-001114

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Charleston Carriage Works, L.L.C.,

Appellant,

v.

Charleston Animal Society, Ellen Harley and  
Charleston Carriage Horse Advocates, Inc.,

Respondents.

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MOTION FOR LEAVE TO EXCEED PAGE LIMITATION

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Appellant moves for an Order of the Court allowing the Appellant to file his initial brief of 66 pages. This motion is based on the ground that Rule 208(b)(5) allows extensions with leave of Court: “On motion, the appellate court may grant a party permission to exceed those [50 page] limitations.” In support of this motion, the Appellant shows that the Orders under review are not narrowly tailored requiring extensive review, and the matter below was extensively briefed involving a large amount of evidence that is impossible to cover adequately in 50 pages. Moreover,

the issues raised in this case are issues of profound significance involving important matters of public policy.

November 11, 2022

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#### DUTY OF CONSULTATION

I certify that prior to making this request, I consulted with opposing counsel who do not oppose Appellant's request.

November 11, 2022

/s/ Thomas R. Goldstein  
Thomas R. Goldstein

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**PROOF OF SERVICE**

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I certify that I have served the Initial Brief, Designation of Contents of Record on Appeal, and Motion to Exceed Page Limits upon the Charleston Animal Society, Charleston Carriage Horse Advocates and Ellen Harley by depositing a copy of it in the United States Mail (and by providing an electronic copy), postage prepaid on August 11, 2022, addressed to their attorneys of record, Elizabeth Palmer at her office Saxton & Stump at 151 Meeting Street, Suite 350, Charleston, South Carolina 29401 and to Joseph Thompson at his office Hall Booth Smith, P.C. at 111 Coleman Boulevard, Mt. Pleasant, S. C. 29464, and to Jenkins Mann at his office, Mann Blake & Jackson at 1901 Main Street, Suite 1205, Columbia, South Carolina 29201.

November 11, 2022

/s/Thomas R. Goldstein

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