

**RECEIVED**

**Nov 18 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
In The Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Appellate Case No. 2022-001056  
Case No. 2020-CP-10-01310

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Mohammad Abulaban.....Appellant,

v.

City of Charleston and South Carolina  
Department of Transportation..... Defendants,

of whom South Carolina Department  
of Transportation is the .....Respondent.

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**APPELLANT’S FIRST MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Mohammad Abulaban respectfully requests a thirty-day (30-day) extension of the deadline for serving the Initial Briefs of Appellant.

As grounds for the motion, Appellant’s counsel cites their present workload and previously scheduled travel and holiday plans. Appellant’s counsel has been actively working on preparation of Appellant’s Initial Briefs but needs additional time to finalize them. This is Appellant’s first request for an extension to file the Initial Briefs.

The Initial Briefs from the appeals of Judge R. Markley Dennis, Jr.'s Orders are due on November 30, 2022. With an extension, the deadline for service of the Initial Briefs of Appellant will be **December 30, 2022**.

Respectfully submitted,

s/J. Matthew Whitehead  
J. Matthew Whitehead (S.C. Bar No. 73803)  
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Attorneys for the Plaintiff/Appellant,  
Mohammad Abulaban

**APPELLANT'S FIRST MOTION FOR  
EXTENSION OF TIME TO FILE INITIAL  
BRIEFS**

Greenville, South Carolina  
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**CERTIFICATE OF SERVICE**

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I certify that on the 18th day of November, 2022, I served a copy of APPELLANT’S FIRST MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEFS on counsel of record in the above-entitled matter by sending the same to the lawyers’ primary e-mail addressed listed in the Attorney Information System (AIS) as follows:

Phillip S. Ferderigos, Esquire - *pferderigos@barnwell-whaley.com*

Jonathan J. Anderson - *janderson@arlawsc.com*

Jonathan L. Anderson - *landerson@arlawsc.com*.

s/J. Matthew Whitehead  
J. Matthew Whitehead (S.C. Bar No. 73803)  
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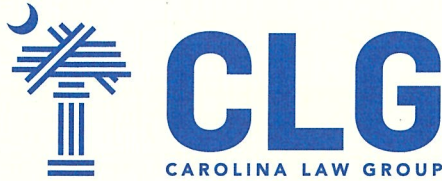
Attorneys for the Plaintiff/Appellant,  
Mohammad Abulaban

**CERTIFICATE OF SERVICE**

Greenville, SC  
November 18, 2022



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**November 18, 2022**  
*(Via Electronic Filing and E-Mail)*

The Honorable Jenny Abbott Kitchings  
SC Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re: Mohammad Abulaban vs. City of Charleston and SCDOT**  
**Appellate Case No. 2022-001056**  
**Case No. 2020-CP-10-01310**

Dear Ms. Kitchings:

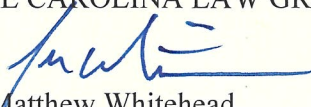
Please find attached for filing **Appellant's Motion for Extension of Time to File Initial Briefs** in the above-referenced matter. This filing is being submitted electronically pursuant to Rule 262, SCACR, and the Supreme Court's May 6, 2022 Amended Order (Appellate Case No. 2020-000447) without additional copies nor a filing fee for this Motion. If any additional copies or the filing fee are required, please let us know.

By copy of this letter and attachments, we are serving same on all parties.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,

THE CAROLINA LAW GROUP, LLC



J. Matthew Whitehead  
[matt@scclg.com](mailto:matt@scclg.com)

JMW/bdp  
w/Attachments

cc: Phillip S. Ferderigos, Esquire (via E-mail)  
Jonathan J. Anderson, Esquire (via E-mail)  
Jonathan L. Anderson, Esquire (via E-mail)



\* Member Million Dollar Advocate Forum