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Dec 21 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In The Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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

Mohammad Abulaban.....Appellant,

v.

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

of whom South Carolina Department
of Transportation is theRespondent.

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

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 a mediation scheduled in this case for January 5, 2023, their present workload and family holiday plans. Should mediation be successful and the case resolved, no briefing would be necessary as the appeal would be withdrawn and the case dismissed. Appellant’s counsel respectfully

requests this extension to finalize and file Appellant's Initial Briefs following the holidays and the upcoming mediation. This is Appellant's second and final 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 January 3, 2023. With an extension, the deadline for service of the Initial Briefs of Appellant will be **February 2, 2023**.

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
November 18, 2022

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Mohammad Abulaban.....Appellant,

v.

City of Charleston and South Carolina
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of whom South Carolina Department
of Transportation is theRespondent.

CERTIFICATE OF SERVICE

I certify that on the 21st day of December, 2022, I served a copy of APPELLANT’S SECOND 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 - *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
December 21, 2022

Mohammad Abulaban v. City of Charleston 2022-001056

Matt Whitehead <matt@scclg.com>

Wed 12/21/2022 1:18 PM

To: JJ Anderson <jjanderson@arlawsc.com>;landerson@arlawsc.com <landerson@arlawsc.com>;Phillip Ferderigos <pferderigos@barnwell-whaley.com>

Cc: Brandi Presnell <brandi@scclg.com>;Felicity J. Moore <fmoore@arlawsc.com>;Molly C. Jankowski <mjankowski@arlawsc.com>

 3 attachments (808 KB)

Letter to Clerk of Court Filing Second Motion for Extension.pdf; Second Motion for Extension of Time to File Initial Briefs - Abulaban v SCDOT.pdf; COS for Second Motion for Extension of Time to File Initial Briefs - Abulaban v SCDOT.pdf;

Please find attached correspondence we are electronically submitting to The South Carolina Court of Appeals Clerk of Court that includes Appellant's Second Motion for Extension of Time to File Initial Briefs that is being electronically filed in the above-referenced matter. Please let me know if you have any questions. Happy Holidays and warm wishes for the New Year!

Thanks,
Matt

--

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December 21, 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

RECEIVED
Dec 21 2022
SC Court of Appeals

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

Dear Ms. Kitchings:

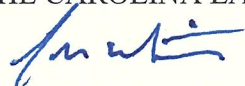
Please find attached for filing **Appellant's Second Motion for Extension of Time to File Initial Briefs** in the above-referenced matter. This filing is being submitted electronically pursuant to Rule 262, SCACR, and the Supreme Court's May 6, 2022 Amended Order (Appellate Case No. 2020-000447) without 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

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