

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

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S.C. SUPREME COURT

Appeal from Charleston County
Court of Common Pleas
Eugene C. Griffith, Jr., Circuit Court Judge

Circuit Court Cases No. 2019-CP-10-00846, -02131, and -02539

Court of Appeals Case No. 2019-000903
Opinion No. 5966 (S.C. Ct. App. filed February 1, 2023)

Supreme Court Case No. 2023-000778

City of Charleston,

Petitioner,

v.

City of North Charleston and Millbrook Plantation, LLC,

Respondents.

and

Millbrook Plantation, LLC

Plaintiff,

v.

City of Charleston,

Defendant.

and

City of Charleston,

Plaintiff,

v.

City of North Charleston and Millbrook Plantation, LLC

Defendants.

**CITY OF CHARLESTON'S
MOTION TO EXCEED PAGE LIMIT**

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NOW COMES Petitioner, City of Charleston (“Charleston”), by and through its undersigned counsel, pursuant to Rules 240 and 242, SCACR, and, on the grounds stated below, most respectfully requests permission to exceed the twenty-five (25) page limit for its petition for a writ of certiorari in the above-captioned matter.

This request, which is made contemporaneously with the submission of Charleston’s petition for a writ of certiorari, is made in good faith in light of the number and nature of the issues/questions presented in this matter, which involves the public interest. Accordingly, the undersigned submits that the extension sought herein is reasonable in scope, in furtherance of the interests of justice, and is not unduly prejudicial to Respondents.

WHEREFORE, Charleston hereby moves this Honorable Court for permission to exceed the page limitation imposed by Rule 242(d)(4), SCACR, and to accept for filing the City of Charleston’s Petition for a Writ of Certiorari, which is submitted contemporaneously herewith.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

By: s/Russell G. Hines
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June 5, 2023