

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

HONORABLE JENNIFER B. McCOY, Circuit Court Judge

Appellate Case No. 2023-001082

TOWN OF SULLIVAN’S ISLAND, Respondent,

v.

NATHAN BLUESTEIN and THEODORE ALBENESIUS, III, Appellants.

MOTION TO AMEND INITIAL BRIEF OF RESPONDENT

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Attorneys for Respondent Town of Sullivan’s Island

Pursuant to Rule 240, SCACR, Respondent Town of Sullivan's Island ("Town") hereby moves to file an amended Initial Brief of Respondent to correct errors in the Table of Authorities. The grounds for this Motion are:

1. On November 8, 2023, the Town timely filed and served the Initial Brief of Respondent.
2. There were technological difficulties in compiling the Table of Authorities and it has come to the attention of counsel for the Town that certain authorities cited in the brief are not included in the Table of Authorities.
3. A copy of the proposed amended Initial Brief of Respondent is attached hereto.
4. The proposed amended Initial Brief of Respondent corrects the errors in the Table of Authorities. It makes no further edits or changes.
5. It will be more efficient for the Court and the parties if the Town is allowed to file an amended brief which contains an accurate Table of Authorities.

For the reasons set forth herein, the Town respectfully requests that the Court grant this Motion to file the proposed amended Initial Brief of Respondent and order that the enclosed Initial Brief of Respondent be substituted for the Initial Brief of Respondent filed and served on November 8, 2023.

s/Alexandra H. Austin

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November 10, 2023
Charleston, South Carolina