

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

Appeal from Charleston County  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

**RECEIVED**

**Jan 16 2024**

**SC Court of Appeals**

Case No. 2022-CP-10-03328  
Appellate Case No. 2023-001006

Justin O'Toole Lucey,

Appellant,

v.

The Town of Mount Pleasant, South Carolina, and  
WIN515, LLC,

Respondents.

**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS**

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Brian L. Quisenberry (SC Bar No. 73637)  
Russell G. Hines (SC Bar No. 72100)  
Zachary M. Kern (SC Bar No. 103731)  
25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Respondent  
The Town of Mount Pleasant,  
South Carolina*

NOW COMES Respondent The Town of Mount Pleasant, South Carolina, by and through its undersigned counsel, joined by and with the consent of Respondent WIN515, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby move for an extension of thirty (30) days' additional time to file/serve Respondents' initial brief and corresponding designation of matter to be included in the record on appeal.<sup>1</sup>

Presently, by orders of this Court filed December 6, 2023, and December 19, 2023, Respondents' initial briefing deadline is today, January 16, 2024. Because of work-related and other time commitments, Respondents request that this deadline be extended by 30 days, submitting most respectfully that such relief is consistent with the interests of justice and will not unduly prejudice any other party to this appeal.

WHEREFORE, Respondents move this Honorable Court to grant them an extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving Respondents' initial brief and designation of matter would be Thursday, February 15, 2024, according to the calculations of the undersigned. Additionally, Respondents respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts on this motion.

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<sup>1</sup> Pursuant to Rule 208(b)(6), SCACR, Respondents intend to join in a

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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Charleston, South Carolina

January 16, 2024

**I join and consent:**  
McCULLOUGH KHAN APPEL

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WIN515, LLC*

Mount Pleasant, South Carolina

January 16, 2024

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single brief and designation of matter.