

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM THE NINTH CIRCUIT COURT OF COMMON PLEAS  
THE HONORABLE JULIE J. ARMSTRONG and THE HONORABLE BENTLEY D. PRICE  
IN CHARLESTON COUNTY  
TRIAL CASE NO.: 2022CP1004068

---

APPELLATE CASE NO.: 2023-001926

---

TAMMY K. MOORE.....Respondent/Plaintiff,  
v.  
BASEM AL KHTAEBEH.....Appellant/Defendant.

---

MOTION TO REINSTATE APPEAL

---

Appellant does hereby move/petition the Honorable South Carolina Court of Appeals for an Order to Reinstate its Appeal pursuant to SCACR 260 for good cause shown as follows. This appeal was timely filed December 13, 2023. Appellant through his undersigned counsel sent correspondence to the Court Reporter requesting an estimate of the cost of the transcript from the hearing on August 14, 2023, a copy of which is attached hereto as Exhibit "A". Appellant's counsel became sidetracked attending to his Mother, as an only child, until her demise on December 26, 2023, and thereafter until her interment on December 31, 2023. Thereafter, Appellant's counsel was grieving for his late Mother, and did not return to work until January 21, 2024. During this time, I believe I had asked my law clerk to follow up on the request, but he apparently did not. He is preparing for the Bar exam. Appellant's counsel's wife/law partner contracted Covid, which was spread to their shared paralegal. The Covid test confirming the source of the illness was January 27,

2024. Ms. Swope normally manages the firm email. As she was very sick, the Court's email of January 30, 2024 was received but not discovered by me until the Order of February 13, 2024 was communicated. I am respectfully requesting this Honorable not punish my client for my firm's personal difficulties, and believe this demonstrates "good cause" shown.

Mr. Hershon is co-counsel, simply as a result of not being relived as counsel in the Common Pleas phase of the action. We had discussed his seeking to be relieved at the Appellate Court level.

Respectfully submitted,

SWOPE LAW FIRM, P.A.

S/William K. Swope  
WILLIAM K. SWOPE, ESQUIRE  
S.C. Bar No.: 15168  
1525 Sam Rittenberg Blvd., Ste. 208  
Charleston, SC 29407  
Ph.: (843)852-4925  
Attorneys for Appellant/Defendant  
Lawrence M. Hershon, Esquire  
S.C. Bar No.: 77514  
The Hershon Law Firm, P.A.  
1565 Sam Rittenberg Blvd., Suite 103  
Charleston, SC 29407  
Lawrence@hershonlawfirm.com  
(843)829-2022  
Attorney for Appellant/Defendant

Charleston, SC  
March 1, 2024

Other counsel of Record:  
URICCHIO, HOWE, KRELL, JACOBSON, TOPOREK & KEITH, P.A.  
Barry Krell, Esquire  
barry@uricchio.com  
J. Deveaux Stockton, Esquire  
deveaux@uricchio.com  
17 ½ Broad Street  
Charleston, SC 29401  
(843)723-7491  
Attorneys for Respondent/Plaintiff