

No. 2024-000700

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**The State of South Carolina  
in the Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS  
HON. ROGER M. YOUNG, SR., CIRCUIT COURT JUDGE

SOUTH CAROLINA FREEDOM CAUCUS, CASEY DOE AND JESSIE NOE, ON THEIR OWN  
BEHALF AND ON BEHALF OF THEIR MINOR CHILDREN, A.N., B.N., AND C.N.,  
*Plaintiffs,*

v.

CHARLESTON COUNTY SCHOOL DISTRICT AND ANITA HUGGINS, IN HER OFFICIAL CA-  
PACITY AS SUPERINTENDENT OF THE CHARLESTON COUNTY SCHOOL DISTRICT,  
*Defendants,*

*Of which*

SOUTH CAROLINA FREEDOM CAUCUS *is the*  
*Appellant,*

&

CHARLESTON COUNTY SCHOOL DISTRICT AND ANITA HUGGINS, IN HER OFFICIAL  
CAPACITY AS SUPERINTENDENT OF THE CHARLESTON COUNTY SCHOOL DISTRICT,  
*are the Respondents.*

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE OPENING BRIEF**

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Under South Carolina Appellate Court Rule 240, Appellant South Carolina Freedom Caucus moves for an extension of time to file its opening brief, currently due on June 20, 2024, to July 22, 2024. Respondents consent to this motion. Good cause exists for this modest extension because the parties are seeking to resolve the underlying litigation and believe that the requested extension would enable those discussions to reach a conclusion—potentially avoiding further proceedings in this Court. Thus, the requested extension would promote a “just, speedy, inexpensive and collaborative resolution,” as encouraged by SCADR, Rule 1. Further, the undersigned counsel has significant conflicting deadlines, including for a lengthy summary judgment motion, multiple *Daubert* motions, and briefs in the U.S. Court of Appeals for the Eighth Circuit and the U.S. Supreme Court.

For these reasons, the Court should grant an extension of time for Appellant to file its opening brief to July 22, 2024.

Respectfully submitted,

s/ Christopher Mills

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MAY 22, 2024

## **CERTIFICATE OF SERVICE**

I, Christopher E. Mills, an attorney, certify that on this day the foregoing Motion was served electronically on all parties via electronic mail in the message filing the Motion with the Court.

Dated: May 22, 2024

s/ Christopher Mills  
Christopher E. Mills