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Aug 26 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable B. Alex Hyman

Case No. 2020-CP-22-00356
Appellate Case No. 2023-001454

Ron Christmas, Appellant,

v.

County of Georgetown; City of Georgetown; and South Carolina Department of Transportation,
Respondents.

**APPELLANT’S MOTION FOR LEAVE TO FILE
CONSOLIDATED 25-PAGE REPLY BRIEF AND TO PERMIT ITS FILING AFTER
LAST OPPOSITION BRIEF FILED**

Pursuant to the South Carolina Appellate Court Rules (“SCACR”), Appellant Ron Christmas respectfully moves for an order permitting the filing of a single consolidated reply brief, not exceeding 25 pages, instead of three 15-page briefs (in response to each Respondent), within 10 days after the submission of the last opposition brief by a Respondent. This will allow the Court to consider all relevant arguments in a streamlined manner and reduce potential redundancies. Currently, the City of Georgetown's opposition brief is due last, on September 12, 2024, as per the Court's Order dated August 5, 2024. If no further extensions are sought by Respondents City of Georgetown or South Carolina Department of Transportation, Appellant's consolidated reply brief would be due by Monday, September 23, 2024.

Appellant consulted with opposing counsel prior to filing this motion, however, Respondents' respective responses are pending.

THEREFORE, Appellant respectfully moves this Court for an Order permitting him to file a Consolidated Reply Brief, with a 25-page limit, by 10 days after the last opposition brief is filed by a Respondent in this matter, making Appellant's new, consolidated reply deadline Monday, September 23, 2024.

Respectfully submitted,

JUSTIN O'TOOLE LUCEY, P.A.

By: /s/Justin O'Toole Lucey
Justin O'Toole Lucey (S.C. Bar No. 15438)
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Attorneys for Appellant

August 26, 2024
Mount Pleasant, SC

THE STATE OF SOUTH CAROLINA
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Ron Christmas, Appellant,

v.

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PROOF OF SERVICE

I, the undersigned, attorney for Appellant Ron Christmas, do hereby certify that I have this date served the foregoing **APPELLANT’S MOTION FOR LEAVE TO FILE CONSOLIDATED 25-PAGE REPLY BRIEF AND TO PERMIT ITS FILING AFTER LAST OPPOSITION BRIEF FILED** by personally serving the same upon the following counsel using the primary email addresses as listed via the Attorney Information System on August 26, 2024.

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August 26, 2024

Charleston, South Carolina

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SC Court of Appeals

VIA FEDEX

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Ron Christmas v. County of Georgetown, et al.*
Appellate Case No. 2023-001454
Circuit Court Case No.: 2020-CP-22-00356

Dear Ms. Kitchings:

Please find enclosed a check in the amount of \$50.00, which represents the required filing fee for *Appellant's Motion for Leave to File Consolidated 25-Page Reply Brief and to Permit Filing After Last Opposition Brief* filed by Appellant on August 26, 2024, in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact me.

Best regards,

/s/ Jennifer Zambriczki

Jennifer Zambriczki
Senior Paralegal

Enclosure
cc: All Counsel of Record