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Sep 13 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Case No. 2021-CP-10-05645

The Charleston School of Law, LLC,
a South Carolina limited liability company,Respondents,

vs.

City of Charleston, a municipal corporation, and
Omshera Hotel Group, LLC,
A North Carolina limited liability company,Defendants,

Of whom City of Charleston, a municipal corporation, isAppellant.

**MOTIONS OF OMSHERA HOTEL GROUP, LLC:
(1) FOR AN ADDITIONAL 10-DAY EXTENSION OF TIME; AND
(2) TO BE REALIGNED IN THE CASE CAPTION AS A PARTY
RESPONDENT TO THIS APPEAL**

(1) Having reviewed the Initial Brief of Appellant, and a draft copy of the Initial Brief of Respondent Charleston School of Law, LLC (“CSOL”), it is the intent of Omshera Hotel Group (“Omshera”) to join in the briefings and arguments of CSOL, and to briefly supplement the statement of facts reported by CSOL, and to supplement CSOL’s Designation of Matter. However, that briefing and the Designation cannot be fully accomplished until CSOL’s Initial Brief and Designation of Matter are formally completed and filed by Monday September 16, 2024.

Accordingly, Omshera seeks an additional eight (8) day period in which to review CSOL's filed Initial Brief, and to formally join therein as stated. If the requested extension is granted by this Court, the Initial Brief of Omshera and Designation of Matter, would be due on or before Monday, September 23, 2024.

(2) Additionally, because the interests of Omshera, and of Respondent Charleston School of Law, LLC ("CSOL") are aligned with respect to the central issue in the within appeal, that is to say the order of the trial court granting judgment on the pleadings, by this Motion Omshera moves for an order of this court to be realigned as a party Respondent in the within Appeal.

Respectfully,

BARR, UNGER & McINTOSH, LLC

s/ Capers G. Barr, III _____

Capers G. Barr, III

S.C. Bar No: 00542

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Attorney for Omshera Hotel Group, LLC

Charleston, South Carolina
September 13, 2024

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Of whom City of Charleston, a municipal corporation, isAppellant.

PROOF OF SERVICE

I, Capers G. Barr, III, of Barr, Unger & McIntosh, LLC, attorneys for the Defendant OmShera Hotel Group, LLC, hereby certify that Defendant OmShera Hotel Group, LLC's **MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER OF RESPONDENT** was served on Appellant on September 13, 2024, by emailing (see attached email) a copy of the same to their counsel of record:

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Attorneys for Respondent

The Charleston School of Law, LLC a South Carolina limited liability company

Respectfully,

BARR, UNGER & McINTOSH, LLC

s/ Capers G. Barr, III

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Charleston, South Carolina
September 13, 2024

**BARR, UNGER
& MCINTOSH**

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September 13, 2024

RECEIVED
Sep 13 2024
SC Court of Appeals

ctappfilings@sccourts.org
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: The Charleston School of Law, LLC v. City of Charleston and Omshera Hotel Group, LLC
Case No: 2021-CP-10-05645
Our File No: 2019-1152.06

Dear Madam Clerk:

Enclosed for filing are the motions of Omshera Hotel Group, LLC: (1) for an Extension of Time to File Initial Brief and Designation of Matter; and (2) that Omshera be realigned as a party Respondent in the within appeal; together with Proof of Service.

We will submit any required filing fee by separate mailing, via First Class mail.

Thank you, and respectfully,

Sincerely yours,



Capers G. Barr, III

CGBIII/jth
Enclosure
cc: Stephen L. Brown, Esquire / sbrown@ycrlaw.com
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