

**RECEIVED**

**Sep 25 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  
Appellate Case No. 2024-000064

---

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

Respondent,

v.

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

Defendants,

Of which City of Charleston, a municipal corporation, is the

Appellant.

---

**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANT**

---

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Wilbur E. Johnson (SC Bar No. 3062)  
Brian L. Quisenberry (SC Bar No. 73637)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

NOW COMES Appellant, City of Charleston, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby moves for an extension of ten (10) days' time to file/serve its initial reply brief.

Pursuant to Rule 208(a)(3), SCRCR, the present deadline for Appellant's initial reply brief is September 26, 2024. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 10 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an extension of 30 days' time to file/serve its initial reply brief. With the extension requested herein, the new deadline for filing/serving the initial reply brief would be October 7, 2024, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Stephen L. Brown (SC Bar No. 66468)  
Wilbur E. Johnson (SC Bar No. 3062)  
Brian L. Quisenberry (SC Bar No. 73637)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Appellant*

Charleston, South Carolina

September 25, 2024

**RECEIVED**

**Sep 25 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  
Appellate Case No. 2024-000064

---

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

Respondent,

v.

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

Defendants,

Of which City of Charleston, a municipal corporation, is the

Appellant.

---

**PROOF OF SERVICE**

---

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Wilbur E. Johnson (SC Bar No. 3062)  
Brian L. Quisenberry (SC Bar No. 73637)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, City of Charleston, a municipal corporation, hereby certify that Appellant's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on Respondent on September 25, 2024, by emailing (see attached email) a copy of the same to their counsel of record:

H. Brewton Hagood, Esquire  
[bhagood@rosenhagood.com](mailto:bhagood@rosenhagood.com)  
Daniel F. Blanchard, III, Esquire  
[dblanchard@rosenhagood.com](mailto:dblanchard@rosenhagood.com)  
Mary Harriet Moore, Esquire  
[mhmoore@rosenhagood.com](mailto:mhmoore@rosenhagood.com)  
ROSEN HAGOOD, LLC

*Attorneys for Respondent,  
The Charleston School of Law, LLC,  
a South Carolina limited liability company*

Capers G. Barr, III, Esquire  
[cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)  
BARR, UNGER & McINTOSH, LLC

*Attorneys for Defendant  
Omshera Hotel Group, LLC,  
a North Carolina limited liability company*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellant*

Charleston, South Carolina

September 25, 2024

**From:** [Bell, Pollyana \(Polly\)](#)  
**To:** [bhagood@rosenhagood.com](mailto:bhagood@rosenhagood.com); [dblanchard@rosenhagood.com](mailto:dblanchard@rosenhagood.com); [mhmoore@rosenhagood.com](mailto:mhmoore@rosenhagood.com); [Jessica McDonald](#); [Capers Barr III](#); [Julie Hall](#)  
**Cc:** [Hines, Russell](#); [Brown, Stephen L.](#); [Johnson, Wilbur](#); [Quisenberry, Brian](#); [Kern, Zachary \(Zach\)](#); [Sandifer, Stephanie](#); [Justman, Aimee](#); [Justman, Barbara](#)  
**Subject:** CSOL v. City of Charleston; Appellate Case No. 2024-000064 (CR 210151)  
**Date:** Wednesday, September 25, 2024 2:19:11 PM  
**Attachments:** [1st Motion for Extension - Initial Reply Brief.pdf](#)  
[image001.png](#)

---

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Reply Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 400 • Charleston, SC 29401  
yclaw.com