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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 and
Omshera Hotel Group, LLC,

Respondents,

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**

CLEMENT RIVERS, LLP
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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.

Presently, by order of this Court filed December 18, 2024, the deadline for Appellant's initial reply brief is January 3, 2025. Appellants' counsel recognizes the notice in the Court's December 18, 2024 order that no further extensions will be granted absent extraordinary circumstances. Mr. Hines had hoped to be able to complete the initial reply brief in a timely manner, but on account of the recent Christmas and New Years holidays, and his related out-of-town travel, he was unable to do so, and he humbly asks that the Court consider the circumstances (disruption to his normal work schedule) as sufficiently out of the ordinary to merit granting the dispensation requested herein, which he most respectfully submits is consistent with the interests of justice and will not unduly prejudice any other party.

WHEREFORE, Appellant moves this Honorable Court to grant it an extension of 10 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 January 13, 2025 according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
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PROOF OF SERVICE

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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** was served on Respondent on January 2, 2025, by emailing (see attached email) a copy of the same to their counsel of record:

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Omshera Hotel Group, LLC,
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Respectfully submitted,
CLEMENT RIVERS, LLP

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Charleston, South Carolina

January 2, 2025

From: [Bell, Pollyana \(Polly\)](#)
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Subject: CSOL v. City of Charleston; Appellate Case No. 2024-000064 (CR 210151)
Date: Thursday, January 2, 2025 12:59:38 PM
Attachments: [3rd 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,

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