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Jan 15 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Maite Murphy, Circuit Court Judge

Appellate Case No. 2024-000636  
Case No. 2017-CP-10-5493

Shem Creek Development Group, LLC,..... Respondent,

v.

The Town of Mount Pleasant, South Carolina,..... Petitioner.

**MOTION FOR EXTENSION OF TIME  
TO FILE BRIEF OF PETITIONER**

The Petitioner respectfully moves this Court for an Order granting a fifteen-day extension of time to file the Brief of Petitioner until January 28, 2025, or in the alternative, a five-day extension until January 21, 2025 (given the weekend and holiday).

The grounds for this motion are as follows:

1. The Brief of Petitioner was due to be filed on or before January 13, 2025.
2. The undersigned counsel, who is principally responsible for the appeal, was at urgent care followed by the emergency room for over 12 hours with his wife on Monday, January 13, 2025, due to an emergency medical condition she was experiencing. He did not get home until after 10 p.m. on that date. Counsel thought that an extension request had been sent to

the Court that day, but did not realize that the extension was not filed. The undersigned learned of the oversight on January 15, 2025, upon receipt of an email from the Clerk's Office. He immediately reached out to opposing counsel who has kindly consented to the additional time requested by reply email (see attached email).

3. The Petitioner has previously requested and been granted 15 days of extension time during this certiorari process. In light of these extraordinary circumstances, the Petitioner respectfully requests the additional ten days in addition to the remaining five days for an extension. Alternatively, if the additional ten days is not allowed, the Petitioner requests to use the remaining five-days of extension time available, which would make the opening brief by January 21, 2025 (given the weekend and holiday).

WHEREFORE, the Petitioner respectfully requests that it be allowed until January 28, 2025, by which to file and serve the Brief of Petitioner.

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January 15, 2025