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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 LEAVE TO FILE/SERVE
INITIAL REPLY BRIEF OF APPELLANT OUT OF TIME**

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Attorneys for Appellant

Now comes Defendant/Appellant, City of Charleston (the “City”), by and through its undersigned counsel, pursuant to Rule 263(b), SCACR (providing, subject to certain exceptions not applicable here, that the Court may extend the time for performing any act), and, on the following grounds, hereby moves this Honorable Court for leave to file/serve the Initial Reply Brief of Appellant out of time

By order filed January 6, 2025, the Court granted the City an extension of time through January 13, 2025, to file/serve its initial reply brief. Because of work-related and other time commitments (including especially those occasioned by the recent holiday season and related family travel plans and the resulting disruption to the undersigned’s normal work schedule) the undersigned needed three (3) additional days to complete the Initial Reply Brief of Appellant, which is now completed and is being provisionally filed/served contemporaneously herewith. The undersigned most humbly submits that there is good cause under the circumstances to grant the relief requested herein, as it is reasonable in scope, in furtherance of the interests of justice, and will not result in any undue prejudice to another party or delay.

Wherefore, the City respectfully requests that the Court allow and accept the Initial Reply Brief of Appellant (which, again, is being provisionally filed/served contemporaneously herewith) as duly filed/served.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

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