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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

IN THE ORIGINAL JURISDICTION OF THE SUPREME COURT

Appellate Case No. 2025-000102

David J. Mason, Individually and as Class Representative,Petitioner,

v.

Town of Surfside Beach, SC; City of North Myrtle Beach, SC;
and P2 of SC, LLC, d/b/a Pivot Parking Respondents.

**RESPONDENTS’ CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND TO PETITION
FOR ORIGINAL JURISDICTION AND EXPEDITED CONSIDERATION**

Pursuant to Rule 263(b), SCACR, Respondent City of North Myrtle Beach, SC, on behalf of itself and Respondents Town of Surfside Beach, SC, and P2 of SC, LLC, d/b/a Pivot Parking (“Pivot Parking”) (collectively, “Respondents”), respectfully request that this Court extend by 20 days, to March 3, 2025, the deadline on which Respondents are required to respond to Petitioner David J. Mason’s Petition for Original Jurisdiction (the “Petition”). Respondents are authorized to state that Petitioner David J. Mason (“Petitioner”), through his counsel, consents to the relief requested in this motion.

Petitioner filed the Petition on January 17, 2025. Respondents City of North Myrtle Beach and Town of Surfside Beach (the “Municipal Respondents”) were properly served on January 21, 2025. Respondent Pivot Parking accepted service on January 28, 2025. Pursuant to Rule 245(c), SCACR, Municipal Respondents’ return to the Petition is due on February 10, 2025.

Respondents require additional time to investigate the allegations in the Petition and to assess and formulate their response. Respondents respectfully request an extension of 20 days, to March 3, 2025, to file their return to the Petition. Counsel for Petitioner has consented to the requested extension.

This motion is made in good faith and not for purposes of delay. In making this motion, Respondents do not waive and expressly reserve any and all jurisdictional, substantive and procedural positions and defenses.

WHEREFORE, Respondents respectfully ask the Court to grant Respondents an extension to file their return to the Petition through and including March 3, 2025.

Signature on following page

Respectfully submitted,

MAYNARD NEXSEN PC

s/

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Myrtle Beach, South Carolina
January 30, 2025

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