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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM CHARLESTON COUNTY

Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2025-001659

Charleston Carriage Works, LLC, Petitioner,

v.

Charleston Animal Society, Ellen Harley,
and Charleston Carriage Horse Advocates, LLC..... Respondents.

RESPONDENTS’ JOINT MOTION FOR EXTENSION OF TIME

Pursuant to Rule 242 of the South Carolina Court of Appeals Rules, Charleston Animal Society, Ellen Harley, and Charleston Carriage Horse Advocates, LLC (Respondents), by and through undersigned counsel, hereby jointly move the Court for an order granting Respondents a twenty (20) day extension of time, until October 9, 2025, in which to file and serve Respondents’ Return to Petitioner’s Petition for a Writ of Certiorari. Respondents would submit that this extension is necessary due to counsels’ workloads resulting from both Mr. Mann and Ms. Palmer being ill in recent weeks. Ms. Palmer had COVID and was largely incapacitated from August 25, 2025, until September 8, 2025, and Mr. Mann has been experiencing sustained abdominal issues for the past month and is scheduled for two outpatient diagnostic procedures on Thursday, September 18, 2025. The deadline has not previously been extended.

Respondents consulted with Petitioner's counsel, Mr. Goldstein, and he has no objection to the motion.

Respectfully submitted,

s/ Jenkins M. Mann

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