

RECEIVED

Nov 04 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

The Honorable Kristi F. Curtis
Circuit Court Judge

Appellate Case No. 2025-000403

Lauren Chambers Tracy, Respondent,

v.

Elijah Osama Mustafa, Appellant.

MOTION FOR EXTENSION OF TIME
DUE TO EXTRAORDINARY CIRCUMSTANCES

Pursuant to Rule 240, SCACR, Respondent Lauren Chambers Tracy, through her undersigned counsel, respectfully requests a **fifteen (15) day** extension of time to file *Respondent's Initial Brief* and *Respondent's Designation of Matter to Include in the Record on Appeal*.

Undersigned counsel acknowledges that this Court has previously granted two extensions in this matter. Counsel requests an additional fifteen-day extension due to extraordinary and unanticipated circumstances affecting undersigned counsel's ability to complete the brief by the current deadline:

1. **Current Appellate Brief:** Undersigned appellate counsel did not serve as trial counsel in this matter. Preparation of this brief has required familiarization with a complex record, extensive research, and coordination with trial counsel. Additional time is needed to

allow trial counsel to review and provide input on the current draft, and for appellate counsel to incorporate any necessary revisions.

2. **Conflicting Appellate Brief.** Undersigned counsel has another appellate brief due in a separate matter (App. Case No. 2025-001384) that is due on the same date as the instant brief. Counsel has requested a five (5) day extension for the conflicting brief via a separate motion, but has not yet received a ruling. Granting the instant motion would afford undersigned counsel the necessary time to complete both briefs.
3. **Petition for Rehearing:** Undersigned counsel received notice of an appellate decision on October 15, 2025 (App. Case No. 2023-00029) requiring the timely drafting and filing of a Petition for Rehearing by October 30, 2025, during time that undersigned counsel had reserved for preparation of the instant brief.
4. **Other Appellate Matters:** Counsel is currently working on a Return to a Motion to Recall Remittitur in another appellate matter (2024-000756), which is currently due on November 10, 2025.
5. **Circuit Court Hearing:** Undersigned counsel has a contested circuit court hearing scheduled for November 6, 2025, one day after the current brief deadline. This hearing requires extensive preparation that undersigned counsel cannot delegate.

Despite these extraordinary demands on undersigned counsel's time, substantial progress has been made on Respondent's brief. Undersigned counsel requires only fifteen (15) additional days to ensure the brief meets this Court's standards and properly serves Respondent's interests.

Respondent's Initial Brief and Designation are currently due Wednesday, November 5, 2025. If granted, the new deadline would be Monday, November 20, 2025. This extension will serve the interests of justice by allowing undersigned counsel adequate time to complete

coordinate with trial counsel. Appellant does not object to an extension. (Exhibit A). Neither Respondent nor undersigned counsel seeks this extension for purposes of delay.

Respondent respectfully requests that this Court hold all deadlines in abeyance pending ruling on this Motion.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)
751 Johnnie Dodds Boulevard, Suite 200
Mount Pleasant, South Carolina 29464
(843) 814-8181
jesse@jessesanchezlaw.com

Attorney for Respondent Lauren Chambers Tracy

November 4, 2025
Mount Pleasant, South Carolina



New Message ↓



Stetson, Hannah D

9:19 AM

To You and Smith, Margaret



Yes, I consent.

Hannah

Sent from my iPhone

On Nov 4, 2025, at 9:03 AM, Jonathan Altman <jaltman@derfneraltman.com> wrote:

Hannah, hope you're well. Our brief is [due November 6th](#), and I have several hearings this week that have become more contentious. Would you be able to consent to a 15 day extension for the filing of Tracy's initial brief? Much appreciated, Jon

Get [Outlook for iOS](#)

↩️ ∨ Reply All



Mail



Calendar



Copilot



Apps

STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

Nov 04 2025

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY

The Honorable Kristi F. Curtis
Circuit Court Judge

Appellate Case No. 2025-000403

Lauren Chambers Tracy, Respondent,

v.

Elijah Osama Mustafa, Appellant.

PROOF OF SERVICE

I, the undersigned, certify that I have served the *Notice of Appearance* for Jesse Sanchez, Esq., and *Motion for Extension of Time* contemporaneously with this filing via electronic mail on Counsel for Appellant, Hannah D. Stetson, Esq. (hstetson@turnerpadget.com), Reginald W. Belcher, Esq. (rbelcher@turnerpadget.com), R. Hawthorne Barrett, Esq. (tbarrett@turnerpadget.com), Jeffrey Ammons, Esq. (jeff@walkerallenlaw.com), and Samuel Wallace Carnwath, III, Esq. (wallace@walkerallenlaw.com) at their respective AIS-designated email addresses on November 4, 2025.

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)
The Law Office of Jesse Sanchez, LLC
751 Johnnie Dodds Boulevard, Suite 200
Mount Pleasant, South Carolina 29464
(843) 814-8181

jesse@jessesanchezlaw.com

Attorney for Respondent Lauren Chambers Tracy



November 4, 2025

VIA UNITED STATES FIRST CLASS MAIL
AND EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED

Nov 04 2025

SC Court of Appeals

RE: Lauren Chambers Tracy, Respondent v. Elijah Osama Mustafa, Appellant
Appellate Case No. 2025-000403

Dear Ms. Kitchings,

Attached for filing on behalf of Respondent Lauren Chambers Tracy, please find the following:

1. Respondent's Motion for Extension of Time, and
2. Proof of Service.

A check from my law firm for the filing fee of fifty dollars (\$50.00) has been deposited in today's outgoing mail. Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez
Jesse Sanchez (SC Bar No. 101906)

Attachments (as stated)

Cc: Jonathan S. Altman, Esq.
Armand Derfner, Esq.
Hannah D. Stetson, Esq.
Reginald W. Belcher, Esq.
R. Hawthorne Barrett, Esq.
Jeffrey Ammons, Esq.
Samuel Wallace Carnwath, III, Esq.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

751 Johnnie Dodds Blvd., Suite 200, Mount Pleasant, SC 29464 P: 843.814.8181 F: 843.284.3953
jesse@jessesanchezlaw.com jessesanchezlaw.com