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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

The Honorable William P. Keesley, Circuit Court Judge

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Appellate Case No. 2025-000647  
Case No. 2022CP3202339

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Nancy Arellano, individually  
and as parent and natural guardian  
of Minor Z.A.,

Respondent,

v.

School District No. Two of Lexington  
County, State of South Carolina,

Appellant.

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RESPONDENT'S MOTION FOR LEAVE TO FILE A REPLY TO APPELLANT'S RETURN

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Respondent, through undersigned counsel, respectfully moves this Court for leave to file a short reply to Appellant's Return filed in opposition to Respondent's Motion for Leave to File a Final Corrected Brief.

In support of this motion, Respondent states:

**Rule 240 Does Not Provide an Automatic Right to File a Reply—but Leave May Be Granted**

Under Rule 240(b), SCACR, a moving party may file a motion, and the opposing party may file a Return. While the Rule does not automatically authorize a reply, the Court may grant leave where a reply would assist the Court in resolving the issues presented.

**Appellant's Return Misstates Multiple Appellate Rules and Raises New Procedural Assertions**

Appellant's Return introduces several new contentions not raised in its brief—specifically, new arguments about alleged prejudice, briefing finality, and the sufficiency of Respondent's motion. These assertions rest on inaccurate interpretations of Rule 208, Rule 210, and Rule 211. A short reply is necessary to correct these inaccuracies and provide the Court an accurate understanding of the governing rules.

**The Proposed Reply Is Short, Limited, and Assists the Court**

The reply (attached as Exhibit A) is narrowly tailored and addresses only the procedural misstatements contained in the Return. It does not reargue matters already presented, does not introduce new issues, and will aid the Court's evaluation of the pending motion.

**No Prejudice Will Result to Appellant**

Granting leave permits the Court to receive a clarifying document that corrects misstatements of law and fact. The reply introduces no new arguments and imposes no prejudice on Appellant.

WHEREFORE, Respondent respectfully requests that the Court:

1. Grant leave to file the Reply attached as Exhibit A; and
2. Grant such other relief as the Court deems just and proper.

s/ Trevor P. Eddy  
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individually and as parent and natural  
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