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Jan 20 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Daniel Coble Circuit Court Judge

Case No. 2025-001903

Bush River C-Store, LLC,Appellant,

v.

South Carolina Department of Transportation,Respondent.

MOTION OF APPELLANT FOR EXTENSION OF TIME

Appellant Bush River C-Store, LLC respectfully move this Court for an extension of time to file and serve their Initial Brief and Designation of Matter.

The Appellant’s motion is based on the grounds that Counsel for Appellant requires additional time to prepare the Initial Brief and Designation of Matter due being hampered by the holidays and being distracted while his wife is being treated for a serious blood disorder, and would respectfully request an additional twenty (20) days to complete, file and serve these pleadings. This is the first request for an extension for the initial brief in this matter. By our calculations, the new deadline would be February 9, 2026.

WHEREFORE, the Appellant respectfully requests that it be granted an additional twenty (20) days to file its Initial Brief and Designation of Matter.

(Signature on the following page)

Respectfully submitted,

MOORE BRADLEY MYERS LAW FIRM, P.A.

BY: s/ S. Jahue Moore

S. Jahue Moore, SC Bar #4063
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Post Office Box 5709
West Columbia, SC 29171
(803) 796-9160

ATTORNEY FOR APPELLANT

West Columbia, South Carolina
January 20, 2026

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PROOF OF SERVICE

I, Diane M. L. Corley, an employee of Moore Bradley Myers Law Firm, P.A., certify that I have served the Appellant’s Motion for Extension of Time on the Respondent by transmitting a copy of same on January 20, 2026, by electronic mail, addressed to its attorney of record as follows:

David G. Pagliarini, Esquire
Pagliarini Law Firm, LLC
145 River Landing Drive, Suite 101-B
Daniel Island, SC 29492
david@lawplf.com


Diane M. L. Corley



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 Ralph Nichols Riley, Jr.
 John C. Bradley, Jr.
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 Sierra Carini Hartley
 Emily E. Collins

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Melissa K. Moore
 Catherine Liscusky Jumper
 Brian M. Eckstrom
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 Madison B. Kelly

Retired
 J. Mark Taylor**
 C. David Sawyer, Jr.†
 Billy C. Coleman (1916-2019)
 Stanley L. Myers†* (1976-2023)
 Robert D. Hazel† (1936-2024)

VIA E-MAIL: ctappfilings@sccourts.org
VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 P.O. Box 11629
 Columbia, SC 29201

RE: Bush River C-Store, LLC vs. SC Department of Transportation
 Appellate Case No.: 2025-001903

Dear Ms. Kitchings:

I hope you are well. Please find the Motion for Extension and Proof of Service with regard to the above matter.

Please contact our office with any questions or concerns. Thank you for your assistance in this matter.

Sincerely,

Diane M. L. Corley
 Legal Assistant to S. Jahue Moore

/dc
 Enclosures
 cc w/encls.: David G. Pagliarini, Esquire