

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

JAN 27 2026

SC 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  
1700 Sunset Boulevard (29169)  
Post Office Box 5709  
West Columbia, SC 29171  
(803) 796-9160

ATTORNEY FOR APPELLANT

West Columbia, South Carolina  
January 20, 2026

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

JAN 27 2026

SC 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,

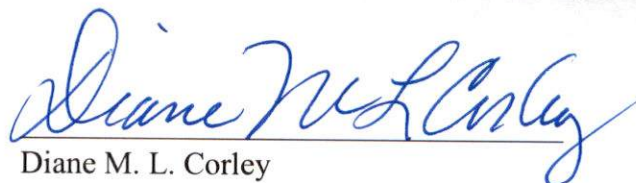
v.

South Carolina Department of Transportation, ..... Respondent.

**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](mailto:david@lawplf.com)

  
Diane M. L. Corley



S. Jahue Moore†  
 James Edward Bradley\*  
 Sheila McNair Robinson  
 Christian G. Spradley  
 William H. Edwards  
 S. Jahue Moore, Jr.  
 William B. Fortino  
 Ralph Nichols Riley, Jr.  
 John C. Bradley, Jr.  
 Lester McGill Bell, Jr.  
 Sierra Carini Hartley  
 Emily E. Collins

Melissa K. Moore  
 Catherine Liscusky Jumper  
 Brian M. Eckstrom  
 Joshua S. E. Martin  
 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)

January 20, 2026

**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

RECEIVED

JAN 27 2026

SC Court of Appeals

RECEIVED

JAN 27 2026

SC Court of Appeals

**MBM** MOORE  
BRADLEY  
MYERS

PO Box 5709, West Columbia SC 29171  
1700 Sunset Boulevard, West Columbia SC 29169

COLUMBIA SC 290

21 JAN 2026 PM 3 L



US POSTAGE<sup>SM</sup> PITNEY BOWES



ZIP 29169 \$ 000.74<sup>0</sup>  
02 4W  
0000388006 JAN 20 2026

RECEIVED

JAN 27 2026

SC Court of Appeals

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

29211-162929

