

RECEIVED

Feb 20 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY
Circuit Court of Common Pleas

William A. McKinnon, #2761 Circuit Court Judge

Appellate Court Case No. 2024-000279

Ashley Williamson,

Appellant

vs.

Rock Point II,

Respondent.

**MOTION TO FILE INITIAL BRIEF OF
RESPONDENT AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL OUT OF TIME**

The Respondent, Rock Point II, by and through its undersigned counsel, James Marshall Biddle, hereby Moves to File Initial Brief of Respondent and Designation of Matter to Be Included in the Record on Appeal Out of Time in accordance with the South Carolina Rules of Appellate Procedure. Grounds for the Request to File the Initial Brief of Respondent and Designation of Matter to Be Included in the Record on Appeal Out of Time is due to Counsel for the Respondent having been caught up with several cases and other previously scheduled legal matters that have taken more time and energy than expected. In addition, Counsel for the Respondent was out of the State for an Annual Vacation immediately following the Christmas holiday and returning to a death in the immediate family that resulted in additional days being missed and delayed the completion of several matters.

BASED upon the foregoing, Counsel for the Respondent requests this Honorable Court to Grant Respondent the opportunity to File the Initial Brief of Respondent and Designation of Matter to Be Included in the Record on Appeal Out of Time.

BIDDLE LAW FIRM, LLC

s/ James Marshall Biddle

James Marshall Biddle, S.C. Bar No. 69471
marshall@biddlelawfirm.net
311 Beaty Street, Suite A
Post Office Box 1119 (29528)
Conway, South Carolina 29526
Telephone: 843-903-1600

Counsel for Respondent, Rock Point II

As City Attorney,

Appellant

Rock Point II

Respondent

OFFICE OF THE CLERK

For information only, please refer to the Respondent's Motion to Reinstate Brief of
Petitioner and Deposition of Petitioner to be held in the Tribunal on Appeal on this 20th
day of February, 2022 by U.S. Magistrate Judge [Name], upon the Appellant, Ashly
Williamson at the following address:

Mr. James Marshall Biddle
311 Beaty Street, Suite A
Conway, SC 29526

BIDDLE LAW FIRM, LLC

James Marshall Biddle, S.C. Bar No. 69471
marshall@biddlelawfirm.net
311 Beaty Street, Suite A
Post Office Box 1119 (29528)
Conway, South Carolina 29526
Telephone: 843-903-1600

Counsel for Respondent, Rock Point II

RECEIVED

Feb 20 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY
Circuit Court of Common Pleas

William A. McKinnon, #2761 Circuit Court Judge

Appellate Court Case No. 2024-000279

Ashley Williamson,

Appellant

vs.

Rock Point II,

Respondent.

PROOF OF SERVICE

I hereby certify that I have served the Respondent's Motion to File Initial Brief of Respondent and Designation of Matter to Be Included in the Record on Appeal on this 20th day of February, 2026 by U.S. Mail, first class postage prepaid, upon the Appellant, Ashley Williamson as the following address:

Ms. Ashley Williamson
2344 Ridge Rock Lane, Apt. B107
Rock Hill, SC 29732

BIDDLE LAW FIRM, LLC

s/James Marshall Biddle
James Marshall Biddle, S.C. Bar No. 69471
marshall@biddlelawfirm.net
211 Boaty Street, Suite A
Post Office Box 1119 (29528)
Conway, South Carolina 29526
Telephone: 843-903-1600

February 20, 2026
Conway, South Carolina

Counsel for Respondent, Rock Point II