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Mar 11 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Judge Steven DeBerry, IV, Circuit Court Judge

Appellate Case No. 2025-001618
Circuit Court Case No. 2022-CP-07-01195

Beaufort County, South Carolina,

Respondent,

v.

Adams Outdoor Advertising Limited Partnership,

Appellant.

**APPELLANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
INITIAL REPLY BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL**

Appellant Adams Outdoor Advertising Limited Partnership (“Appellant” or “Adams”), by and through its undersigned counsel, without objection from Respondent Beaufort County, South Carolina (“Respondent”), respectfully moves this Court, pursuant to Rules 240 and 263, SCACR, for entry of an Order extending the time within which Appellant must file its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal by fifteen (15) days, such that the deadline would be extended to April 3, 2026. The grounds for this motion are as follows:

1. Pursuant to Rules 208(a) and 209(a), because Respondent's Initial Brief was filed and served on March 9, 2026, Appellant's Initial Reply Brief and Designation of Matter is currently due by March 19, 2026.

2. Appellant seeks a 15-day extension of said deadline to allow undersigned counsel sufficient time to review the Respondent's brief and prepare its Initial Reply Brief and, to the extent necessary, the accompanying Designation of Matter to be Included in the Record on Appeal.

3. Appellant's counsel has a brief due on March 11, 2026 in a separate appeal pending before this Court. Additionally, Appellant's attorneys will be representing a separate client in a three-day trial in the Charleston County Court of Common Pleas from March 16 through March 18, 2026, which may require additional time beyond three days.

4. Given these concerns, as well as the other professional commitments of Appellant's attorneys in the days leading up to the current deadline, Appellant respectfully submits that additional time is necessary for its attorneys to prepare an adequate initial reply brief.

5. This is Appellant's first request for an extension of time to file its initial reply brief and designation of matter, and the request is supported by good cause and is not made in an effort to unnecessarily delay these proceedings.

6. Accordingly, Appellant respectfully requests that this Court enter an Order extending the deadline for Appellant to file and serve its Initial Reply Brief and Designation of Matter by fifteen (15) days, such that the proposed date of the new deadline is April 3, 2026. Granting this motion would promote the interests of justice and preserve Court resources.

7. This Motion is supported by the grounds set forth herein and the South Carolina Appellate Court Rules. Counsel for Appellant conferred with counsel for Respondent prior to

filing the instant motion and Respondent's counsel advised that Respondent does not oppose the extension of time requested in this motion.

Respectfully submitted,

s/Evan P. Williams

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*Attorneys for Appellant Adams Outdoor
Advertising Limited Partnership*

March 11, 2026
Mt. Pleasant, South Carolina

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Beaufort County, South Carolina,

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PROOF OF SERVICE

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*Attorneys for Defendant Adams Outdoor
Advertising Limited Partnership*

I certify that I have served *Appellant's Unopposed Motion for Extension of Time to File Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal* on the other party to this matter via email to its counsel of record, on this 11th day of March 2026, containing the document as an attachment in .pdf, sent to the email addresses shown below.

Brian Earl Hulbert (S.C. Bar No. 68537)
Office of the Beaufort County Attorney
102 Industrial Village, Bldg. 2
Beaufort, SC 29901
Email: brian.hulbert@bcgov.net

Attorney for Respondent

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Law Office of Scott D. Bergthold, P.L.L.C.
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Attorney for Respondent

s/Evan P. Williams
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*Attorneys for Appellant Adams Outdoor
Advertising Limited Partnership*

March 11, 2026

¹ Pursuant to Rule 262(c)(3), SCACR, and Sections (d)(1) and (d)(3) of the South Carolina Supreme Court's April 24, 2024 Order, No. 2024-04-24-01, titled "Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules," Pro Hac Attorney Bergthold is being served via email to the primary email address listed in the AIS for the associated South Carolina lawyer, Attorney Hulbert.

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Evan P. Williams
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March 11, 2026

VIA E-MAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RECEIVED
Mar 11 2026
SC Court of Appeals

Re: Appellate Case No. 2025-001618: Motion Filing Fee
Beaufort County, South Carolina v. Adams Outdoor Advertising Limited Partnership
Appeal from Circuit Court Case No. 2022-CP-07-01195

Dear Ms. Kitchings:

Please find enclosed, on behalf of Appellant Adams Outdoor Advertising Limited Partnership (“Appellant”), Bybee & Tibbals, LLC’s check number 1760 in the amount of \$50.00, payable to the South Carolina Court of Appeals, for payment of the filing fee for Appellant’s Unopposed Motion for Extension of Time to File Initial Reply Brief and Designation of Matter in the above-captioned matter. The Motion was filed and served today, March 11, 2026.

Opposing counsel of record is being served with this correspondence by copy on the email transmitting the same. Please advise if we can provide any further information.

Yours Sincerely,



Evan P. Williams

Enclosure(s)

cc (via e-mail only): Brian Earl Hulbert, Esq.
Scott D. Bergthold, Esq.
Jeffrey S. Tibbals, Esq.