

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.

APPELLANT’S MOTION FOR 2ND EXTENSION OF TIME

Appellant Bush River C-Store, LLC respectfully moves this Court for an extension of time to file and serve its 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 to Counsel for Appellant’s limited availability due to his health, to a very active caseload, mediations, and scheduled court obligations, and would respectfully request an additional fourteen (14) days to complete, file and serve these pleadings. This is the second request for an extension in this matter.

By our calculations the new due date would be April 20, 2026.

WHEREFORE, the Appellant respectfully requests that it be granted an additional fourteen (14) 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
April 8, 2026

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Apr 08 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 2nd Extension of Time on the Respondent by transmitting a copy of same on April 8, 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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Apr 08 2026

SC Court of Appeals

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)

April 8, 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:

Please find included with this cover letter Appellant's Motion for 2nd Extension of Time, Proof of Service, and firm check in the amount of \$50.00 for the filing of the same. The motion and proof of service were filed earlier today through e-mail.

Thank you in advance for your assistance in this matter.

Sincerely,

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

Enclosures

cc: David G. Pagliarini, Esquire