

**RECEIVED**

**Apr 15 2026**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable Circuit Court Judge Benjamin H. Culbertson

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Court of Appeals Case No. 2025-002197

Thomas Scott Jackson,

Respondent,

v.

Candelabra, Inc. D/B/A Meadow  
Blu, D/B/A Lyndon Leigh, and  
Whitney Moore,

Appellants.

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**MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

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TO THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Appellant Corel Lenhardt, through her undersigned counsel hereby requests of the Court an extension of time to file Respondent's Reply Brief. Respondent's Reply Brief is currently due May 6, 2026. Obligations of Respondents' counsel on other cases necessitate an extension of time for the undersigned to draft and finalize a Reply Brief.

Specifically, on April 2, 2026, Counsel for Respondent received a notice for trial in the United States District Court. The Trial Notice Order is attached as Exhibit 1. Notably, Pursuant to the Trial Notice, the undersigned must appear for Jury Selection in Florence, south Carolina on April 21, 2026. Moreover, the District Court set deadlines for trial-

related matters for April 14 and April 17, prior to a May 12, 2026, “date certain” trial date. This trial is anticipated to last five days.

For these reasons, the undersigned respectfully requests a 93-day extension of time, until Friday, August 7, 2026, to file Respondent’s Reply Brief. Prior to filing this motion, Appellant’s counsel consulted with counsel for Respondent, who consents to the requested extension.

Respectfully submitted,

s/ Emmanuel J. Ferguson  
Emmanuel J. Ferguson  
S.C. Bar # 81431  
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Attorney for Respondent

Charleston, South Carolina  
Date: April 15, 2026

Other Counsel of Record:

Matthew A. Abee  
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Columbia, SC 29204  
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Attorney for Appellant

## Exhibit 1

April 2, 2026 Federal Trial Notice



Pretrial Brief as required by Local Civil Rule 26.05(N) (D.S.C.). Otherwise, such objection will be deemed waived. Additionally, the exhibit list shall be furnished by each side to the Courtroom Clerk on the day of trial. All exhibits listed shall be deemed admitted for all purposes unless the court denies admission based on objections submitted to the court as set out above.

**April 17, 2026**

All **Requests for Charge, Requests for Voir Dire, and Proposed Verdict Forms** shall be submitted **JOINTLY** to the Court by email to [dawson\\_ecf@scd.uscourts.gov](mailto:dawson_ecf@scd.uscourts.gov) in **MS WORD format**. Joint Requests for Voir Dire must include a **joint** list of witnesses along with their addresses as well as the occupation of each witness. **These documents shall not be filed.**

**April 14, 2026**

The list of jurors will be available in the CM/ECF. The Court will submit written interrogatories to the jury venire. **THESE INTERROGATORIES WILL NOT BE REPEATED AT JURY SELECTION.**

**April 14, 2026**

Copies of the responses to the written interrogatories submitted to the jury venire will be available for review in CM/ECF. Attorneys and parties are advised that they must file a “Juror Questionnaire & List Request” form in the appropriate case via CM/ECF using the Certification -Juror Questionnaire and List Request event, found under Other Filings -Trial Documents to obtain access to the questionnaires. You may obtain the form from the Jury Administrator at the Clerk’s Office or from the Court’s Internet site at <https://www.scd.uscourts.gov>.

**April 17, 2026**

All **Strikes for Cause** must be submitted **JOINTLY** by email to chambers at [Dawson\\_ecf@scd.uscourts.gov](mailto:Dawson_ecf@scd.uscourts.gov) and are to be filed with the Court in CM/ECF **no later than 12:00 pm** on the due date. To file Strikes for Cause, select Category, “Trial Documents,” and then select Event Code, “Request to Strike for Cause.” Judge Dawson’s Joint Strikes for Cause form is located on the Court’s website under Forms—Jury. Please list all joint strikes as well as a list of strikes not agreed upon.

**April 21, 2026**

**9:30 a.m.**

**McMillan Federal Building**

**401 West Evans Street Florence, SC 29501**

**Jury Selection.**

**May 12, 2026**

**9:00 a.m.**

**McMillan Federal Building**

**401 West Evans Street Florence, SC 29501**

**Trial.**

Attorneys for each party shall, at least seven (7) days prior to the date for submission of pretrial briefs, meet for the purpose of exchanging and marking all exhibits to be used at trial, and, where possible, agree on the admissibility of all trial exhibits. In the event there is an objection to any exhibit, the attorneys must notify the Court of such objection at least two (2) days prior to trial. Otherwise, such objection will be deemed waived. The exhibit list shall be furnished by each side to the Courtroom Clerk on the day of trial. All exhibits listed shall be deemed admitted for all purposes unless the court denies admission based on objections submitted to the court as set out above.

**COUNSEL ARE REQUIRED TO USE THE ELECTRONIC COURTROOM PRESENTATION SYSTEM IN TRIAL.** It is **YOUR** responsibility to contact the court clerk for information regarding use of the electronic courtroom **PRIOR TO TRIAL**.

**THE COURT MAY NOT CONSIDER ANY REQUESTS FOR CHARGE, REQUESTS FOR VOIR DIRE, OR ANY EXHIBITS FOR ADMISSION DURING TRIAL SUBMITTED AFTER THE ABOVE DATE.**

When a civil action scheduled for jury trial is settled or otherwise disposed of in advance of the actual trial, then, except for good cause shown, all juror's costs, including marshal's fees, mileage, and per diem, may be assessed equally against the parties and their counsel or otherwise assessed as directed by the Court, unless the Clerk's Office is notified **at least one full business day prior to the date on which the action is scheduled for trial**. Notification to the Clerk's Office is necessary in order to notify jurors that their presence will not be required.

In accordance with the provisions of 28 U.S.C. § 636(c), you are hereby notified that the United States Magistrate Judges of the District Court, in addition to their other duties, may, upon consent of all parties in a civil case, and with the approval of the District Judge, conduct any or all proceedings, including a Jury or Non-Jury trial, and order the entry of a final judgment.

BY DIRECTION OF THE COURT  
ROBIN BLUME, CLERK