

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Circuit Court Judge Benjamin H. Culbertson

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.

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

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
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Date: April 15, 2026

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