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**May 15 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
In the Court of Common Pleas  
Eugene C. Griffith, Jr., Circuit Court Judge

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Appellate Case No.: 2025-001903

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Bush River C-Store, LLC,

Appellant,

vs.

South Carolina Department of Transportation,

Respondent.

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**CONDEMNOR'S FIRST MOTION FOR EXTENSION OF TIME**

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Respondent South Carolina Department of Transportation (“Respondent” or “SCDOT”) respectfully moves this Court for an extension of time to file and serve its Response to Appellant’s Initial Brief and Designation of Matter.

The Respondent’s Motion is based on the grounds that Counsel for Respondent requires additional time to prepare its Response Brief due to a very active caseload, including a trial scheduled to begin May 26, 2026. Appellant’s previous requests for extensions of time twice altered the calendar deadline for which SCDOT’s Response to Appellant’s Initial Brief was due, making the upcoming deadline only a few days prior to a set trial date in another case.

For the reasons herein, Respondent respectfully requests that this Court grant an additional 30 days to file its Response to Appellant’s Initial Brief, providing a new deadline of Friday, June 19, 2026.

PAGLIARINI LAW FIRM, LLC



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David G. Pagliarini, Esq.

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*Attorneys for Condemnor*

Charleston, South Carolina

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CERTIFICATE OF SERVICE

I, Tyler Pierson, the undersigned Legal Assistant of Pagliarini Law Firm, LLC, attorneys for Condemnor, South Carolina Department of Transportation, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by U.S. certified mail return receipt requested and emailing the same to the following address(es):

**Pleadings:    RESPONDENT'S FIRST MOTION FOR EXTENSION OF TIME**

Parties Served:    **Via Electronic Mail and U.S. Certified Mail**  
S. Jahue Moore, Sr., Esq.  
Callee Liscusky Jumper, Esq.  
Moore, Bradley & Meyers Law Firm, P.A.  
1700 Sunset Blvd.  
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callee@mbmlawsc.com

*Attorneys for Appellants*

  
Tyler Pierson

Charleston, South Carolina  
May 15, 2026

PAGLIARINI LAW FIRM, LLC

ATTORNEYS AT LAW

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SC Court of Appeals

David G. Pagliarini, Esquire  
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145 River Landing Drive, Suite 101 B  
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Phone: 843-971-8646  
Fax: 843-971-8745

May 15, 2026

**Via Electronic Mail: ctappfilings@sccourts.org**

**Via Electronic Mail:**

S. Jahue Moore, Sr., Esq.  
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[callee@mbmlawsc.com](mailto:callee@mbmlawsc.com)

Re: Bush River C-Store, LLC v. South Carolina Department of Transportation  
Appellate No: 2025-001903

Dear Counsel:

Please find enclosed for service upon you in the above-referenced matter, Respondent's Motion for Extension of Time.

If you have any questions regarding the enclosed, please do not hesitate to contact our office.

Sincerely,



David G. Pagliarini

DGP/tp  
Enclosure(s)

cc: (w/ enclosures, via email only)  
Diane M. L. Corley ([diane@mbmlawsc.com](mailto:diane@mbmlawsc.com))

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May 15, 2026

**Via U.S Mail and Electronic Mail: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
PO Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Re: Bush River C-Store, LLC v. South Carolina Department of Transportation  
Appellate No: 2025-001903

Dear Ms. Kitchings:

Enclosed please find Respondent's Motion for Extension of Time for electronic filing. Additionally, enclosed please find our firm's check in the amount of \$50.00 as the required filing fee.

By copy of this letter to the Richland County Clerk of Court and counsel of record, we are serving them with a copy of this notice.

If you have any questions regarding the enclosed, please do not hesitate to contact our office.


Sincerely,



David G. Pagliarini

DGP/tp  
Enclosure(s)

cc: (Respondent's First Motion for Extension of Time via Electronic Mail Only; Filing Fee Check via U.S. Mail)  
S. Jahue Moore, Sr., Esq. (via electronic mail only)

<b>PAGLIARINI LAW FIRM LLC</b> 145 RIVER LANDING DRIVE - SUITE 101B DANIEL ISLAND, SC 29492		2123
PAY TO THE ORDER OF <u>South Carolina Court of Appeals</u>		DATE <u>5/15/2026</u> 67-801/532
<u>Fifty and 10/100</u>		\$ <u>50 -</u>
SOUTHERN FIRST BANK		DOLLARS  Security Features Included. Details on Back.