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Jun 18 2026

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Robert L. Reibold, Administrative Law Judge
Docket No. 25-ALJ-17-0156-CC

Appellate Case No. 2026-001190

Matthew DeNapoli and Lindsay DeNapoli.....Appellants,

v.

Charleston County Assessor,Respondent.

APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Thursday, June 18, 2026

Appellants Matthew DeNapoli and Lindsay DeNapoli, proceeding pro se,
respectfully move this Court pursuant to SCACR Rules 207, 208, 263, and the
Court's inherent authority for an extension of time to file their initial brief.

[Continued on Next Page]

MEMORANDUM IN SUPPORT

Conferral

Pursuant to SCACR Rule 240 and customary practice, Appellants conferred with Respondent's counsel as a courtesy, prior to filing this motion. On June 17, 2026, Appellants sent a detailed conferral email to Bernard E. Ferrara, Jr., Esq., Marc G. Belle, Esq., Kevin M. DeAntonio, Esq., Andrew L. Hethington, Esq., and other listed counsel, requesting their position on and no objection to the requested extension. Appellants requested a response by close of business due to the impending filing deadline. **As of the time of this filing, no response has been received.** (See **Exhibit B** – June 17, 2026 Conferral Email and Proof of Transmission.).

Appellants note that under **SCACR Rule 263(b)**, any extension of time prescribed by the Rules may be granted only by the appellate court (or a judge or justice thereof) and may not be extended by agreement of the parties. Accordingly, Appellants respectfully request that the Court exercise its discretion to grant the extension for good cause shown below.

Procedural History and Good Cause

1. Appellants filed their Notice of Appeal on May 20, 2026, from the Administrative Law Court's Order Granting Summary Judgment (April 3, 2026) and Order Denying Reconsideration (April 29, 2026), initiating Appellate Case No. 2026-001190.
2. On May 27, 2026, within the time prescribed by SCACR Rule 207(b)(1), Appellants timely served a detailed Request to Obtain Transcript and Designation of Record on the Administrative Law Court Clerk (pursuant to SCACR Rules 207(a), (b)(1), and 208). A copy was also served on Respondent and the Court of Appeals. (See **Exhibit A** – May 27, 2026 Request.)

3. As of June 17, 2026, the Administrative Law Court has not responded, acknowledged receipt, or transmitted the Record on Appeal or any transcript/recordings.
4. Because Respondent was granted summary judgment, Appellants do not know whether a formal transcript exists. In particular, a critical Status Conference on or about February 17–19, 2026, with Judge Reibold addressed threshold procedural defects (unresolved motions and issues that should have been decided before summary judgment). Appellants do not know whether that conference was recorded or transcribed, or whether it should have been. This uncertainty materially affects the briefing timeline under SCACR Rule 208(a).
5. The administrative record is voluminous (thousands of documents) and contains substantial sensitive Personal Identifying Information (PII), including unredacted tax returns listing income, Names of Appellants minor children amongst other sensitive details and, government forms of identification such as vehicle registrations, South Carolina drivers license and voter identification cards, produced by Respondent in discovery. Pursuant to **S.C. Code Ann. § 30-2-330** and the **South Carolina Supreme Court’s Revised Order (April 15, 2014)**, Appellants must review and redact all PII. This burden is heightened for pro se litigants without full access to the Attorney Information System (AIS)/Courts Management System (CMS).
6. Without the transmitted Record on Appeal and transcript, Appellants cannot prepare a compliant Statement of Facts or Argument with proper citations as required by SCACR Rule 208(b). See SCACR Rule 263 (extensions for good cause).

This constitutes good cause for the requested extension. The delay is not due to any lack of diligence by Appellants.

RELIEF REQUESTED

Appellants respectfully request a 60-day extension (or, alternatively, 30 days after receipt of the complete certified Record on Appeal and transcript, whichever is later) to file their Initial Brief.

WHEREFORE, Appellants pray that this Motion be granted and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

s/Matthew DeNapoli

Matthew DeNapoli, Pro Se Appellant
918 Casseque Province, Mount Pleasant, SC 29464
Matt Phone: (703) 930-6473
Email: mdenapoli@spacecomintl.com

s/Lindsay DeNapoli

Lindsay DeNapoli, Pro Se Appellant
918 Casseque Province, Mount Pleasant, SC 29464
Lindsay Phone: (703) 930-6473
Email: lindsaydenapoli@yahoo.com

Date: Thursday, June 18, 2026

EXHIBIT-A

RECEIVED

Jun 18 2026

SC Court of Appeals

Subject: Re: [External] DeNapoli Appeal from Administrative Law Court / 25-ALJ-17-0156-CC
Date: Wednesday, May 27, 2026 at 4:54:49 PM Eastern Daylight Time
From: Matt DeNapoli <MattDeNapoli@spacecomintl.com>
To: jshealy@scalculator.net <jshealy@scalculator.net>, Jared Thompson <jthompson@scalculator.net>
CC: Bernard Ferrara <bferrara@charlestoncounty.org>, Court Of Appeals Filings <ctappfilings@sccourts.org>, Lindsay DeNapoli <lindsaydenapoli@yahoo.com>
Attachments: image001.png, ALC_Request for Transcript Case No. 25-ALJ-17-0156-CC pages 1 - 4.pdf

Dear Ms. Shealy and Mr. Thompson,

Please see attached request, pursuant to Rule 207, 208 SCACR. If there is anything we can do to help facilitate or coordinate efforts, please advise. Thank you!

Matthew DeNapoli
918 Casseque Province
Mount Pleasant, South Carolina 29464
(703) 930-6473
mdenapoli@spacecomintl.com
Pro Se Appellant

Regards,
Matt DeNapoli

SPACCOM
INTERNATIONAL

CONFIDENTIAL NOTICE: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Date: Thursday, May 21, 2026 at 9:48 AM
To: Matt DeNapoli <MattDeNapoli@spacecomintl.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Lindsay DeNapoli <lindsaydenapoli@yahoo.com>
Cc: Bernard Ferrara <bferrara@charlestoncounty.org>; jshealy@scalculator.net <jshealy@scalculator.net>
Subject: RE: [External] DeNapoli Appeal from Administrative Law Court / 25-ALJ-17-0156-CC

The Court has received your filing. A stamped copy is attached for your records.

Thank you!

From: Matt DeNapoli <MattDeNapoli@spacecomintl.com>

Sent: Wednesday, May 20, 2026 7:18 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Lindsay DeNapoli <lindsaydenapoli@yahoo.com>

Cc: Bernard Ferrara <bferrara@charlestoncounty.org>; jshealy@scalco.net

Subject: DeNapoli Appeal from Administrative Law Court / 25-ALJ-17-0156-CC

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Ms. Kitchings,

Enclosed for filing is an original, notice of appeal in the above case served electronically via email in accordance with SCACR Rule 262(a)(3) and (c)(3).

Attachments:

1. A photocopy of the check for \$250 sent first class mail today, is attached for your reference
2. Order Denying Motion to Reconsider from The Administrative Law Court, The Honorable Robert L. Reibold
3. Order Granting Motion for Summary Judgement from The Administrative Law Court, The Honorable Robert L. Reibold
4. SCACR Appendix C, Form 6 (Appellants Notice of Appeal)
5. SCACR Appendix C, Form 7 (Proof of Service)
6. SCACR Appendix C, Form 8 (Letter to the Clerk, South Carolina Court of Appeals)
7. SCACR Appendix C, Form 9 (Letter to the Clerk, South Carolina Administrative Law Court)

All parties have now been properly served by depositing the appropriate contents in the U.S. Postal Service, first class mail, served electronically or both, in accordance with the rules (SCACR) and Appendices (Form 7), this 20th day of May, 2026. If you have any questions or need additional information, please don't hesitate to contact me.

Sincerely,

Matt DeNapoli
Pro Se Appellant
918 Casseque Province
Mount Pleasant, South Carolina (29464)
(703) 930-6473
mdenapoli@spacecomintl.com

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**REQUEST FOR TRANSCRIPT FROM ADMINISTRATIVE TRIBUNAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Robert L. Reibold, Administrative Law Judge

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**Case No. 25-ALJ-17-0156-CC**

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Charleston County Assessor, Respondent,

v.

Matthew DeNapoli and Lindsay DeNapoli, Appellants.

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**REQUEST TO OBTAIN TRANSCRIPT**

**AND**

**DESIGNATION OF RECORD**

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**(Pursuant to SCACR Rules 207(a), (b)(1), and 208)**

Pro Se Appellants Matthew DeNapoli and Lindsay DeNapoli respectfully request that the Administrative Law Court and/or the appropriate Clerk prepare, certify, and transmit the complete record on appeal, including transcripts or official recordings of all proceedings, and specifically designate the following critical items:

**1. Transcript / Official Recordings of All Proceedings.**

The full stenographic transcript (or certified audio/video recordings if no stenographic transcript was prepared) of all hearings, status conferences, and proceedings before the

Administrative Law Court in this matter, including but not limited to the February 18, 2026 status conference.

## **2. Specific Critical Items Designated.**

- The video recording and/or official transcript of the April 23, 2025 Charleston County Board of Assessment Appeals (BAA) hearing (RC24-003), which was submitted into the ALC record with Appellants' Cross-Motion for Partial Summary Judgment on March 10, 2026, as Exhibit A-4 (and related exhibits).
- The Assessor approved 2015 Legal Residence Special Assessment Application
- The Assessors internal Document Checklist marked **“Complete”**,
  - All supporting documents submitted by Appellants with their 2015 application, including (but not limited to);
  - The December 2014 and January 2015;
    - South Carolina Driver's Licenses;
    - South Carolina Vehicle Registrations;
    - Voter IDs;
    - Official Change of Address forms submitted to the Auditor.
- Approval Letter dated September 23, 2015

These documents establish Appellants' prima facie entitlement pursuant to S.C. Const. art. X, §1, to the legal residence four percent (4%) assessment classification and the vested nature of that approval under S.C. Code § 12-43-220(c)(2)(iv) and Act 259 of 2014.

### 3. All Affidavits.

All affidavits submitted by the parties and considered by the Court in connection with Respondent's Motion for Summary Judgment and Appellants' Cross-Motion.

### 4. Designation of the Entire Record.

Appellants designate the **entire administrative record** below (including all filings, exhibits, attachments, electronic docket entries, and any other materials) as necessary for full appellate review. Because Appellants are proceeding pro se and do not have access to the electronic court record, Appellants request that the ALC identify and direct the parties (and the Court of Appeals) to the precise location(s) of any audio, video, or other records within the electronic docket.

Appellants understand that a formal stenographic transcript may not exist for all proceedings. In that event, Appellants request certification of any available audio or video recordings as part of the record on appeal and ask to be advised of the procedure and any associated costs for obtaining copies.

This request is made in connection with the Notice of Appeal filed on May 20, 2026.

Respectfully submitted,

May 27, 2026

/s/ Matthew DeNapoli  
Matthew DeNapoli  
918 Casseque Province  
Mount Pleasant, South Carolina 29464  
(703) 930-6473  
[mdenapoli@spacecomintl.com](mailto:mdenapoli@spacecomintl.com)

*Pro Se* Appellant

/s/ Lindsay DeNapoli

Lindsay DeNapoli

918 Casseque Province

Mount Pleasant, South Carolina 29464

(571) 344-8266

[lindsaydenapoli@yahoo.com](mailto:lindsaydenapoli@yahoo.com)

*Pro Se* Appellant

CC: Bernard E. Ferrera Jr.  
Chief Deputy County Attorney  
4045 Bridge View Drive  
North Charleston, SC 29405  
(843) 958-4019  
[bferrara@charlestoncounty.org](mailto:bferrara@charlestoncounty.org)  
Attorney for Respondent

CC: Jenny Abbott Kitchings,  
Clerk of Court,  
South Carolina Court of Appeals  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

## EXHIBIT-B

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**Subject:** [Appellate Case No. 2026-001190] - Conferral on Motion

**Date:** Wednesday, June 17, 2026 at 10:46:13AM Eastern Daylight Time

**From:** Matt DeNapoli <MattDeNapoli@spacecomintl.com>

**To:** Bernard Ferrara <bferrara@charlestoncounty.org>

**CC:** Andrew L Hethington <alhethington@charlestoncounty.org>, Kevin M. Deantonio <kdeantonio@charlestoncounty.org>, Marc Belle <mbelle@charlestoncounty.org>, Catherine S. Anderson <csanderson@charlestoncounty.org>, Lindsay DeNapoli <lindsaydenapoli@yahoo.com>

Dear Mr. Ferrara et al.,

I'm curious to know who you've designated as the lead counsel for handling day-to-day matters and correspondence in this appeal? We intend to file a motion for extension of time to file the initial brief, as we've not received any response from the ALC on our request.

As you know, the Record contains a substantial volume of evidence, including thousands of documents, emails, video, audio, and other materials. Notably, this includes a plethora of sensitive personal information such as, un-redacted tax returns and other personal identifying information that were produced by Respondent during discovery in the underlying ALC case. Pursuant to S.C. Code Ann. § 30-2-330 and the South Carolina Supreme Court's Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings (*April 15, 2014, Order No. 2014-04-15-02*), and related guidance (enforced through **SCACR Rules 267** (Form of Papers), to include but not limited to; 210 (Record on Appeal), 209 (Designation), 262 (Filing and Service), and 240 (Motions)), parties are required to redact sensitive information such as Social Security numbers, driver's license numbers, taxpayer identification numbers, financial account details, full home addresses, dates of birth, and similar data in all filings, including the Record on Appeal and appendices. Pro se litigants bear the same responsibility to ensure compliance before public filing. Since "full home addresses" on government issued documents and federal documents is at the heart of our case, we likely request to seal those particular records.

As you are also aware, pro se litigants do not have the same visibility and access to the South Carolina Attorney Information System ("AIS"), the portal for E-Filing, and the South Carolina Court Management System ("CMS") that licensed attorneys have. For reference, our May 27, 2026 request to the ALC Clerk (pursuant to SCACR Rules 207(a), (b) (1), and 208) for the complete Record, transcripts/recordings, and designation of critical items (including the full administrative record, 2015 approval documents, BAA hearing recording, affidavits, etc.) remains pending.

We therefore seek your position on (and **no objection to**) a motion requesting a 60-day extension (or, alternatively, 30 days after receipt of the entire certified Record from the ALC) to file Appellants' Initial Brief. Given our other obligations and the need to file the motion before 1:00 p.m. today, we respectfully request a timely response from any of the attorneys

handling this matter by close of business today. Your prompt attention is appreciated so that we may proceed accordingly.

Respectfully,  
Matthew DeNapoli  
Pro Se Appellant  
918 Casseque Province  
Mount Pleasant, SC 29464

Jun 18 2026

SC Court of Appeals

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Robert L. Reibold, Administrative Law Judge  
*Docket No. 25-ALJ-17-0156-CC*

**Appellate Case No. 2026-001190**

Matthew DeNapoli and Lindsay DeNapoli.....Appellants,

v.

Charleston County Assessor, .....Respondent.

**PROOF OF SERVICE**

I certify that on **June 18, 2026**, a true and correct copy of the **APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** was served in the following manner:

- A **courtesy copy** was sent via electronic mail to the following:  
Bernard E. Ferrara, Jr., Esq. ([bferrara@charlestoncounty.org](mailto:bferrara@charlestoncounty.org)),  
Marc G. Belle, Esq. ([mbelle@charlestoncounty.org](mailto:mbelle@charlestoncounty.org)),  
Kevin M. DeAntonio, Esq. ([kdeantonio@charlestoncounty.org](mailto:kdeantonio@charlestoncounty.org)),  
Andrew L. Hethington, Esq. ([alhethington@charlestoncounty.org](mailto:alhethington@charlestoncounty.org)),  
Jana Shealy ([jshealy@scalcn.net](mailto:jshealy@scalcn.net)), Jared Thompson ([jthompson@scalcn.net](mailto:jthompson@scalcn.net)) and,  
Jenny Abbott Kitchings, [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).
- Formal service was effected by depositing the same in the **United States Mail**, postage prepaid, properly addressed to:

*[Continued]*

**Charleston County Attorney's Office**, Counsel for Respondent  
Bernard E. Ferrara, Jr., Esq. et al;  
Lonnie Hamilton, III Public Services Building 4045 Bridge View Drive North  
Charleston, South Carolina 29405

**Jana Shealy**, Clerk, Administrative Law Court and,  
Edgar A. Brown Building  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201

**Jared Thompson**, Law Clerk for Judge Reibold  
Edgar A. Brown Building  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201

**Jenny Abbott Kitchings**, Clerk of Court, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**Respectfully submitted,**

s/Matthew DeNapoli

Matthew DeNapoli, Pro Se Appellant  
918 Casseque Province, Mount Pleasant, SC 29464  
Matt Phone: (703) 930-6473  
Email: [mdenapoli@spacecomintl.com](mailto:mdenapoli@spacecomintl.com)

s/Lindsay DeNapoli

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