

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

RECEIVED
Jul 17 2026
SC Court of Appeals

The Honorable Roger M. Young, Sr., Circuit Court Judge

The Honorable Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2026-000964
Case No. 2020-CP-10-02357

Lysandra Serrano, Savannah McKenzie,
Cassandra Aungst, Sydney Brown, and Ryan
Coughlin, individually and on behalf of others
similarly situated,

Appellants,

v.

Charleston Southern University,

Respondent.

**APPELLANTS' MOTION FOR LEAVE TO FILE INITIAL BRIEF
IN EXCESS OF FIFTY-PAGE LIMIT**

Respectfully,

RICHARDSON THOMAS, LLC

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Attorneys for the Appellants

Dated: July 17, 2026

Appellants Lysandra Serrano, Savannah McKenzie, Cassandra Aungst, Sydney Brown, and Ryan Coughlin, individually and on behalf of others similarly situated (collectively, “Appellants”), respectfully move, pursuant to Rules 208(b)(5) and 240, SCACR, for leave to file an Initial Brief not exceeding fifty-five (55) pages. In support of this Motion, Appellants show the Court as follows:

1. Rule 208(b)(5), SCACR, limits a principal brief to fifty pages but expressly authorizes the appellate court, on motion, to permit a party to exceed that limitation.

2. This appeal arises from a putative class action brought by Appellants to recover tuition, room, and board payments retained by Charleston Southern University (“CSU”) after CSU closed its campus, residence halls, dining facilities, and other on-campus services during the Spring 2020 semester.

3. Appellants’ initial brief seeks review of two separate circuit court orders, each presenting numerous factual and legal issues. The first appeal concerns the order setting aside CSU’s default. CSU’s Motion to Set Aside Default and supporting memorandum totaled twenty-five (25) pages, excluding exhibits, and the circuit court’s order granting that motion totaled ten (10) pages. The second appeal concerns the order granting summary judgment to CSU. CSU’s Motion for Summary Judgment and supporting memorandum totaled forty-eight (48) pages, excluding exhibits, and the circuit court’s order granting summary judgment totaled an additional thirty (30) pages.

4. Those filings and orders raise numerous factual and legal grounds that Appellants must address to provide this Court with a complete and useful presentation of the issues. Appellants must also explain the substantial evidentiary record, the separate tuition and housing agreements, the competing damages calculations, and the procedural history concerning default and summary judgment.

5. Appellants have made every reasonable effort to eliminate repetition and present the appeal efficiently. Even with substantial editing, however, the fifty-page limitation would require Appellants either to omit preserved issues or to give inadequate treatment to material rulings and arguments that form the basis of the appeal.

6. The requested enlargement is limited. Appellants seek permission to file an Initial Brief not exceeding fifty-five (55) pages, rather than an unlimited extension. The additional pages are requested solely to permit a fair, organized, and complete discussion of the issues and the rulings under review.

7. Granting this Motion will not prejudice CSU. CSU will have the opportunity to respond to every issue in its Respondent's Brief and may seek comparable relief under Rule 208(b)(5), SCACR, if reasonably necessary.

WHEREFORE, Appellants respectfully request that this Court enter an order permitting Appellants to file an Initial Brief not exceeding fifty-five (55) pages, together with such other and further relief as the Court deems just and proper.

Respectfully submitted,

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PROOF OF SERVICE

I certify that I have served Initial Brief of Appellants, Appellants' Motion for Leave to File Initial Brief in Excess of Fifty-Page Limit, and Designation of Matter to be Included in the Record on Appeal on all counsel of record in this matter by providing a copy of all via electronic mail to counsel of record's electronic mail addresses that are on file with the Attorney Information System as set forth below:

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