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Jul 27 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Daniel Coble Circuit Court Judge

Case No. 2025-001903

Bush River C-Store, LLC,Appellant,

v.

South Carolina Department of Transportation,Respondent.

**MOTION TO FILE FINAL BRIEF OUT OF TIME
AND FOR AN EXTENSION**

Appellant, Bush River C-Store, LLC, respectfully moves this Court for permission to file out of time, and for an extension of time to file and serve its Final Brief.

The Appellant's motion is based on the grounds that Counsel for Appellant had CT Scans as part of his routine care from having cancer and a trial. Due to these circumstances, the deadline to file the Final Brief on July 22, 2026, was inadvertently missed. Counsel requires additional time to prepare the Final Brief and respectfully requests an additional thirty (30) days to complete, file and serve this pleading. This is the first request for an extension for the final brief in this matter. By our calculations, the new deadline would be August 22, 2026.

WHEREFORE, the Appellant respectfully requests that it be granted an additional thirty (30) days to file its Final Brief.

(Signature on the following page)

Respectfully submitted,

MOORE BRADLEY MYERS LAW FIRM, P.A.

BY: s/ S. Jahue Moore

S. Jahue Moore, SC Bar #4063
1700 Sunset Boulevard (29169)
Post Office Box 5709
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(803) 796-9160

ATTORNEY FOR APPELLANT

West Columbia, South Carolina
July 27, 2026

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PROOF OF SERVICE

I, Diane M. L. Corley, an employee of Moore Bradley Myers Law Firm, P.A., certify that I have served the Appellant's Motion to File Final Brief Out of Time and for an Extension by transmitting a copy of same on July 27, 2026, by electronic mail, addressed to its attorney of record as follows:

David G. Pagliarini, Esquire
Pagliarini Law Firm, LLC
145 River Landing Drive, Suite 101-B
Daniel Island, SC 29492
E-mail: david@lawplf.com


Diane M. L. Corley



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SC Court of Appeals

S. Jahue Moore†
James Edward Bradley*
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
S. Jahue Moore, Jr.
William B. Fortino
Ralph Nichols Riley, Jr.
Lester McGill Bell, Jr.
Sierra Carini Hartley
Emily E. Collins

Melissa K. Moore
Catherine Liscusky Jumper
Brian M. Eckstrom
Joshua S. E. Martin
Madison Kelly Bush

Retired

J. Mark Taylor*†
C. David Sawyer, Jr.†
John C. Bradley, Jr.
Billy C. Coleman (1916-2019)
Stanley L. Myers*† (1976-2023)
Robert D. Hazel† (1936-2024)

July 27, 2026

VIA E-MAIL: ctappfilings@sccourts.org
VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Bush River C-Store, LLC vs. SC Department of Transportation
Appellate Case No.: 2025-001903

Dear Ms. Kitchings:

I hope you are well. Please find enclosed our firm check in the amount of \$50.00 for our Motion to File Final Brief Out of Time and for an Extension in this matter.

Please contact our office with any questions or concerns. Thank you for your assistance with this notification.

Sincerely,

Diane M. L. Corley
Legal Assistant to S. Jahue Moore

Enclosure

cc w/encls.: David G. Pagliarini, Esquire