

RECEIVED

Oct 29 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable William A. McKinnon, Circuit Court Judge

**Appellate Case No. 2026-001159**

**Case No. 2024-CP-46-02996**

E.B., a minor, E.R., a minor, S.S., individually and on behalf of E.B., C.B.,  
individually and on behalf of E.B., and K.M., individually and on behalf  
of E.R., .....Appellants,

v.

Uber Technologies, Inc., Rasier LLC, Andrew Ross Clark, an individual,  
Elizabeth Caracas, an individual, and DOES 3-25, ..... Respondent.

---

**UNOPPOSED MOTION FOR ADDITIONAL 45-DAY EXTENSION OF TIME  
TO FILE INITIAL BRIEF ON BEHALF OF  
RESPONDENT ELIZABETH CARACAS**

---

Respondent Elizabeth Caracas, by and through her undersigned counsel, respectfully move the Court for an additional 45-day extension of time to file the Initial Brief on behalf of Respondent Elizabeth Caracas (collectively “Caracas”) to provide time to mediate the issues on appeal, and if the appeal goes forward, to give counsel additional time to review the entire record and be properly prepared to file Caracas’ Initial Brief.

This motion is made pursuant to South Carolina Appellate Court Rules 263 and 240. Rule 263 authorizes this Court, or any judge or justice thereof, to extend the time to perform any act short of serving the notice of appeal. Rule 240 governs motions for such an extension of time.

In support of the requested relief, Uber states the following:

1. Caracas was served with Appellants' Initial Brief and Designation of Matter to be included in the Record on Appeal via electronic mail on July 30, 2026.
2. Pursuant to Rule 208 and Rule 263 of the South Carolina Appellate Court Rules, Caracas' Initial Brief was initially due on August 31, 2026, as thirty days after July 30, 2026, fell on a Saturday and thirty-one days fell on a Sunday.
3. Caracas sought and obtained a 60-day extension from this Court by Order on August 19, 2026, with the extension up to and including October 30, 2026, to file their Initial Brief and Designation of Matter to be included in the Record on Appeal.
4. Caracas now requests an additional extension of 45 days to file their Initial Brief and Designation of Matter to be included in the Record on Appeal.
5. An additional extension of 45 days would allow for the filing of Caracas' Initial Brief and Designation of Matter to be included in the Record on Appeal up to and including December 14, 2026.
6. As grounds for the additional extension, Caracas cites the parties' agreement to mediate the issues before this Court. The parties have already agreed to a mediator and that mediation will potentially result in the dismissal of this appeal.
7. Counsel for Appellants consented to this additional 45-day extension on October 21, 2026.

8. The requested extension will not prejudice Appellants and is sought in good faith to ensure the issues are fully and properly presented for the Court's consideration.

WHEREFORE, Caracas respectfully requests that the Court grant an additional 45-day extension of time, up to and including December 14, 2026, for filing the Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal.

Respectfully submitted,

*s/Michael T. Coulter*

Michael T. Coulter (SC Bar #15177)

Coulter, Monroe & McDonald, LLC

410 East Washington Street

Greenville, South Carolina 29601

Phone: (864) 884-5732

*Attorneys for Respondent Elizabeth Caracas*

October 29, 2026

Greenville, South Carolina

RECEIVED

Oct 29 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable William A. McKinnon, Circuit Court Judge

**Appellate Case No.: 2026-001159**

**Case No.: 2024-CP-46-02996**

E.B., a minor, E.R., a minor, S.S., individually and on behalf of E.B., C.B., individually and on behalf of E.B. and K.M., individually and on behalf of E.R., .....Appellants,

v.

Uber Technologies, Inc., Rasier LLC, Andrew Ross Clark, an individual, Elizabeth Caracas, an individual, and DOES 3-25.....Respondents.

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies that on August 18, 2026, a copy of **Motion for Extension of Time to File Initial Brief on behalf of Elizabeth Caracas** was served on all counsel of record via electronic mail to counsels' individual AIS electronic mail address:

**Counsel for Plaintiffs/Appellants**

Harper T. Segui (Bar No. 77730)

[hsegui@leesegui.com](mailto:hsegui@leesegui.com)

**LEE SEGUI PLLC**

825 Lowcountry Blvd., Unit 101

Mount Pleasant, SC 29464

(843) 790-6520

Glenn A. Danas\* (Cal. Bar No. 270317)

[gdanas@clarksonlawfirm.com](mailto:gdanas@clarksonlawfirm.com)

**CLARKSON LAW FIRM, P.C.**

Tracey Cowan\* (Cal. Bar No. 250053)

[tcowan@clarksonlawfirm.com](mailto:tcowan@clarksonlawfirm.com)

Brent A. Robinson\* (Cal. Bar No. 289373)  
[brobinson@clarksonlawfirm.com](mailto:brobinson@clarksonlawfirm.com)  
Christen L. Chapman\* (Cal. Bar No. 332245)  
[cchapman@clarksonlawfirm.com](mailto:cchapman@clarksonlawfirm.com)  
\*Admitted Pro Hac Vice 22525  
Pacific Coast Highway Malibu, CA 90265  
(213) 788-4050

**Counsel for Defendant/Respondent Uber Technologies, Inc. and Rasier LLC**

James P. Sullivan (Bar #77436)  
Kelley Shull Cannon (Bar #8532)  
**HOWSER NEWMAN & BESLEY, LLC**  
1508 Washington Street  
Columbia, SC 29201  
803-758-6000  
[kcannon@hnblaw.com](mailto:kcannon@hnblaw.com)  
[jsullivan@hnblaw.com](mailto:jsullivan@hnblaw.com)

-and-

Julie L. Hussey admitted pro hac vice  
[Julie.hussey@ashurstperkins.com](mailto:Julie.hussey@ashurstperkins.com)  
Jennifer Huckleberry admitted pro hac vice  
[Jennifer.huckleberry@ashurstperkins.com](mailto:Jennifer.huckleberry@ashurstperkins.com)

**Ashurst Perkins Coie US LLP**  
11452 El Camino Real Ste 300  
San Diego, CA 92130-2080  
858-720-5750

-and-

Karl J. Worsham pro hac vice admission pending  
[Karl.worsham@ashurstperkins.com](mailto:Karl.worsham@ashurstperkins.com)  
**Ashurst Perkins Coie US LLP**  
2525 East Camelback Road, Suite 500  
Phoenix, AZ 85012

**Counsel for Defendant/Respondent Andrew Ross Clark**

Robert D. Moseley, Jr. (SC Bar #64084)  
Christian E. W. Fober (SC Bar #102520)  
**Moseley Marcinak Law Group LLP**  
4324 Wade Hampton Blvd., Suite B  
PO Box 26148 (29616)  
Greenville, South Carolina 29687  
(864) 248-6025  
[Rob.Moseley@momarlaw.com](mailto:Rob.Moseley@momarlaw.com)  
[Christian.Fober@momarlaw.com](mailto:Christian.Fober@momarlaw.com)

*(Signature Page to Follow)*

*s/Michael T. Coulter*

Michael T. Coulter (SC Bar #15177)

Coulter, Monroe & McDonald, LLC

410 East Washington Street

Greenville, South Carolina 29601

Phone: (864) 884-5732

*Attorneys for Respondent Elizabeth Caracas*

October 29, 2026

Greenville, South Carolina