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Jun 16 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

Appeal from Charleston County
Court of Common Pleas

R. Kirk Griffin, Circuit Court Judge

Appellate Case No. 2021-001443
Circuit Court Case No. 2011-CP-10-07166

Otha Delaney,
Individually and on behalf of all others similarly situated,

Respondent,

v.

First Financial of Charleston, Inc.,

Petitioner.

**MOTION FOR EXTENSION OF TIME
TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI**

CLEMENT RIVERS, LLP
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Additional Attorneys for Petitioner

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA SUPREME COURT

NOW COMES Petitioner, First Financial of Charleston, Inc., by and through its undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby moves for an extension of ten (10) days' time to file/serve its petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

The Court of Appeals decided this case by Order filed March 10, 2022, and thereafter denied Petitioner's timely petition for reinstatement/rehearing by order filed May 17, 2022, making the deadline for Petitioner to file/serve a petition for writ of certiorari today, June 16, 2022, pursuant to Rule 242(c), SCACR. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days, beyond today's date, to prepare Petitioner's petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioner respectfully requests that this Honorable Court grant it an extension of ten (10) days' time to file/serve its petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving its petition for writ of certiorari would be June 27, 2022, according to the undersigned's calculations. Further, Petitioner respectfully requests that the Court hold this present deadline in abeyance until it acts upon this motion.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*
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Charleston, South Carolina

June 16, 2022

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Otha Delaney,
Individually and on behalf of all others similarly situated,

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v.

First Financial of Charleston, Inc.,

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PROOF OF SERVICE

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Additional Attorneys for Petitioner

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that Petitioner's **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on June 16, 2022, via email (see attached) to their following counsel of record:

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Additional Counsel for Respondent

I also certify that Petitioner's **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on June 16, 2022, via email (see attached) to ctappfilings@sccourts.org.

CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*
Russell G. Hines
Attorneys for Petitioner

Charleston, South Carolina

June 16, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, June 16, 2022 10:26 AM
To: 'hawkinslawfirm@aol.com'; 'Twombly@twlawfirm.com'; 'andrea@twlawfirm.com';
'rick@1214law.com'; 'mandi@chandlerdudgeon.com'; 'tiffany@chandlerdudgeon.com';
'lwalters@twlawfirm.com'; 'dale.h.friedman@gmail.com'
Cc: Hines, Russell; Justman, Aimee
Subject: Delaney v. First Financial //Appellate Case No. 2021-001443
Attachments: 1st Motion for Extension - Petition for Writ.doc.pdf

Enclosed please find Petitioner's Motion for Extension of Time to Serve/File Petition for Writ of Certiorari in the above-referenced matter which will be filed today.

Thank you,

Pollyana Bell
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