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Jun 17 2022

SC Court of Appeals

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

Appeal from Dorchester County
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Case No. 2012-CP-18-02583

Court of Appeals Case No. 2019-000644
Unpublished Opinion No. 2022-UP-113 (S.C. Ct. App. filed March 16, 2022)

Jennifer McFarland and Carlton Holcombe,

Petitioners,

v.

Thomas Morris and David Hannemann,

Respondents.

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

CLEMENT RIVERS, LLP
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Attorney for Petitioners

NOW COMES Petitioners, Jennifer McFarland and Carlton Holcombe, by and through their 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 move for an extension of ten (10) days' time to file/serve their 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 opinion filed March 16, 2022, and thereafter denied Petitioner's timely petition for rehearing by order filed May 19, 2022, making the deadline for Petitioners to file/serve a petition for writ of certiorari Tuesday, June 21, 2022, pursuant to Rules 242(c) and 263(a), SCACR.¹ Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond June 21, 2022, 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.

¹ The 30th day after May 19, 2022, is Saturday, June 18, 2022. Monday, June 20, 2022, is a federal holiday (Juneteenth).

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 July 1, 2022, according to the undersigned's calculations. Further, Petitioners respectfully request that the Court hold their present deadline to petition for a writ of certiorari in abeyance until it acts upon this motion.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

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PROOF OF SERVICE

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(843) 720-5488

Attorney for Petitioners

I, Russell G. Hines, of Clement Rivers, LLP, attorney for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** was served on Respondents on June 17, 2022, via email (see attached) to Respondents' counsel of record:

Morgan S. Templeton, Esquire
morgan.templeton@walltempleton.com
William W. Watkins, Jr., Esquire
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WALL TEMPLETON & HALDRUP, P.A.
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and

Graham P. Powell, Esquire
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THE POWELL FIRM LLC
409 Coleman Boulevard, Suite 200
Mount Pleasant, SC 29464

Attorneys for Respondents

I also certify that Petitioners' **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 17, 2022, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorney for Petitioners

Charleston, South Carolina

June 17, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Friday, June 17, 2022 1:48 PM
To: 'morgan.templeton@walltempleton.com'; 'trey.watkins@walltempleton.com';
'graham@plawsc.com'
Cc: Hines, Russell; Justman, Aimee
Subject: McFarland v. Morris // Appellate Case No. 2019-000644 (Court of Appeals)
Attachments: McFarland v. Morris - Mot. for Ext. re Cert. Pet.pdf

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

Thank you,

Pollyana Bell
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