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Mar 28 2024

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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Mar 25 2024

SC Court of Appeals

APPEAL FROM BERKELEY COUNTY
In the Court of Common Pleas for the Ninth Circuit

Roger M. Young, Sr., Circuit Court Judge

Appellate Case No. 2024-000427

Susan Brooks Knott Floyd Petitioner,

v.

Elizabeth Pope Knott Dross Respondent.

CONSENT MOTION FOR EXTENSIONS OF TIME
RE: PETITION FOR A WRIT OF CERTIORARI

AND NOW COMES Respondent Elizabeth Pope Knott Dross ("Respondent"), pursuant to Rule 240 of the South Carolina Appellate Court Rules, and respectfully requests a thirty (30) day extension of the deadline for serving and filing its Return to the Petition for Writ of Certiorari in this matter. Additionally, Petitioner Susan Brooks Knott Floyd ("Petitioner") requests a ten (10) day extension of time to file its eventual Reply in Support of Petition for Writ of Certiorari.

1. Petitioner served and filed her Petition for a Writ of Certiorari on March 18, 2024.
2. Therefore, in accordance with Rule 242(f), the deadline for Respondent's Return to the Petition for a Writ of Certiorari is currently April 17, 2024.
3. Due to the complexity and volume of issues in this appeal and a previously-scheduled family trip, Respondent's counsel requires an extension of time to file and serve her Return to Petition for a Writ of Certiorari.
4. Specifically, Respondent respectfully requests that the Court extend this deadline by 30 days, until May 17, 2024.

5. In that instance, Petitioner's Reply in Support of her Petition for a Writ of Certiorari would be due on May 28, 2024 (the tenth day is a holiday).

6. Counsel for Petitioner has requested a 10-day extension of her time to file her Reply in Support of Petition for a Writ of Certiorari until June 7, 2024.

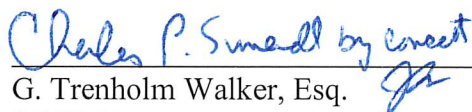
7. Respondent and Petitioner believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon any party.

8. This Respondent's first request for an extension to file its Return to Petition for a Writ of Certiorari.

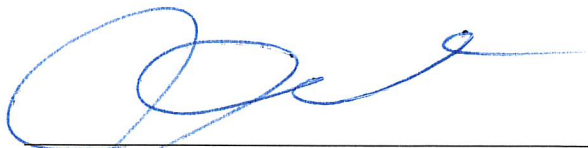
9. Counsel for Petitioner and Respondent have agreed and consented to the relief requested herein.

WHEREFORE, for all of the foregoing reasons, Respondent Elizabeth Pope Knott Dross moves this Honorable Court to grant it an extension of 30 days to file and serve its Return to Petition for a Writ of Certiorari. With the requested extension of time, the new deadline for filing and serving Respondent's Return to Petition for a Writ of Certiorari will be May 17, 2024. Additionally, Respondent consents to an extension of time for Petitioner's Reply in Support of Return to Petition for a Writ of Certiorari until June 7, 2024. Additionally, Respondent respectfully requests that the Court hold its present deadline for the service and filing of its Return to Return to Petition for a Writ of Certiorari in abeyance until it acts upon this Motion.

March 25, 2024


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