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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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 EXTENSION OF TIME FOR PETITIONER’S REPLY

AND NOW COMES Petitioner Susan Brooks Knott Floyd ("Petitioner"), pursuant to Rule 240 and Rule 263(b) of the South Carolina Appellate Court Rules, and respectfully requests a ten (10) day extension of the deadline for serving and filing a Reply to Return to Petition for Writ of Certiorari filed by Respondent Elizabeth Pope Knott Dross ("Respondent"). Respondent consents to this requested extension.

1. Petitioner served and filed her Petition for a Writ of Certiorari on March 18, 2024.
2. Pursuant to Rule 242(f), the initial deadline for Respondent's Return to the Petition for a Writ of Certiorari was April 17, 2024.
3. On March 25, 2024, Respondent filed a Consent Motion requesting extensions of time for both Respondent’s Return and Petitioner’s Reply.
4. By Order dated March 29, 2024, the Court approved a twenty-day extension until May 7, 2024, for Respondent’s Return. The Order did not address the requested ten-day extension for Petitioner’s Reply.

5. Respondent filed her Return on May 7, 2024. Pursuant to Rule 242(g), the deadline for Petitioner's Reply to the Return is currently May 17, 2024.

6. Due to the complexity and volume of issues in this appeal, Petitioner requests a ten-day extension of time until May 28, 2024 (the tenth day is a holiday) to serve and file her Reply to Respondent's Return.

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

8. This is Petitioner's first request for an extension to file a Reply, and Respondent consents to this requested extension.

WHEREFORE, for all of the foregoing reasons, Petitioner Susan Brooks Knott Floyd moves this Honorable Court to grant her a ten-day extension until May 28, 2024, to file and serve her Reply to Return to Petition for a Writ of Certiorari.

May 8, 2024



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