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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable L. Casey Manning

Circuit Court Case No. 2015-CP-40-07268
Appellate Case No. 2021-00898

Jimmy Helms.....Respondent,

v.

Debbie Willing,Appellant.

**APPELLANT’S REQUEST FOR ADDITIONAL EXTENSION
AND CERTIFICATE OF SERVICE**

On July 24, 2024, this Court filed its Opinion No. 2024-UP-277 in this matter. This Court granted to Appellant a 30-day extension, until September 9, 2024, in which to file her Petition for Rehearing. Appellant hereby respectfully requests an additional extension of 20 days, until September 30, 2024, to file a Petition for Rehearing.

This motion is made in good faith and not for the purpose of delay. The grounds for the request include the current workload of the undersigned counsel, which includes six appellate filing deadlines within the space of one week, as well as the complexities of the issues involved in this case. In addition to a high volume of work, the undersigned counsel has been grappling with truly devastating and extraordinarily time-consuming

matters concerning her elderly father, who has rapidly worsening dementia. It is a terrible disease.

Wherefore, Appellant respectfully asks that this Court would give her until September 30, 2024, to file her Petition for Rehearing.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/Ainsley F. Tillman

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September 3, 2024

PROOF OF SERVICE

I certify that I served the within Motion for Extension on counsel for Respondent by sending a copy of the same to Respondent's attorney of record, S. Jahue Moore, at his email address listed with the AIS, contemporaneously with the electronic filing of this Motion.

s/Ainsley F. Tillman