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Sep 23 2024

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 an extension, until September 30, 2024, in which to file her Petition for Rehearing. Appellant hereby respectfully requests an additional extension of 15 days, until October 15, 2024, to file a Petition for Rehearing.

This motion is made in good faith and not for the purpose of delay. As explained previously, the undersigned counsel’s father, who lives alone in Virginia, has dementia which has been catastrophically worsening. Horribly, it turns out that he was forgetting to mention that he was experiencing some significant internal bleeding. Thus, he was hospitalized on September 15, and the undersigned traveled to Virginia to be with him

in the hospital. He lacks capacity to understand why he is in the hospital, and every day is a new saga. His care needs are very high, and the undersigned is working to help transition him on discharge. The undersigned counsel can anticipate that it will be difficult to find time to draft a petition in the coming weeks.

For this extraordinary reason, Appellant respectfully asks that this Court would give her until October 15, 2024, to file her Petition for Rehearing.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/Ainsley F. Tillman

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September 21, 2024

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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