

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**RECEIVED**  
**Feb 20 2025**

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

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**S.C. SUPREME COURT**

Court of Appeals Case No. 2021-000898

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Jimmy Helms.....Respondent,

v.

Debbie Willing, .....Appellant.

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**APPELLANT’S REQUEST FOR EXTENSION OF TIME  
IN WHICH TO SERVE AND FILE PETITION FOR WRIT OF CERTIORARI  
AND CERTIFICATE OF SERVICE**

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Pursuant to Rules 240 and 263, SCACR, Appellant Debbie Willing hereby respectfully moves for an extension of time in which to serve and file her Petition for Writ of Certiorari (the “Petition”). On January 27, 2025, the Court of Appeals issued its Order, denying rehearing; the deadline to file and serve petitions to this Court for a writ of certiorari is therefore February 26, 2025. Appellant respectfully requests an extension of thirty (30) days to serve and file her petition for a writ of certiorari. If granted as requested, the Petition would then be due to be served and filed on March 28, 2025.

This motion is made in good faith and not for the purpose of delay. Counsel for Appellant is mindful of this Court’s Order dated July 14, 2014, pertaining to extensions in cases seeking a petition for a writ of certiorari, and she respectfully states that there do exist

extraordinary circumstances beyond her control which compel her to make this request. Undersigned counsel's elderly father has been hospitalized; he has dementia, and she is his primary caregiver. The next several weeks of his care look to be time-consuming, complex, and difficult, including moving him from his home in Richmond, Virginia, into a community in Charleston, South Carolina. In addition to that sad and heavy responsibility, she hopes to attend her brother's wedding in Dubai during the third week of March.

For these extraordinary reasons, Appellant respectfully asks that this Court would give her until March 28, 2025, to file her Petition for a Writ of Certiorari.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/Ainsley F. Tillman

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*Attorneys for Appellant Debbie Willing*

Charleston, South Carolina

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**PROOF OF SERVICE**

**S.C. SUPREME COURT**

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