

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**Mar 17 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 SECOND REQUEST FOR EXTENSION OF TIME  
IN WHICH TO SERVE AND FILE PETITION FOR WRIT OF CERTIORARI  
AND CERTIFICATE OF SERVICE**

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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 was therefore February 26, 2025. This Court kindly granted to Appellant a first extension of twenty days in which to file her petition for a writ of certiorari, making the Petition due on March 18, 2025. Pursuant to Rules 240 and 263, SCACR, Appellant Debbie Willing hereby respectfully moves for a second extension of time in which to serve and file her Petition for Writ of Certiorari (the "Petition"), until April 7, 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 on multiple occasions; he has dementia, and she is his primary caregiver, as well as his agent for healthcare decisions. His recent care has been extraordinarily time-consuming, complex, sad, and difficult, due to the need to move him from his home in Richmond, Virginia, into a memory care community in Charleston, South Carolina, which has been a difficult and confusing transition for him. In addition to that sad and heavy responsibility, she is also scheduled to attend her brother's wedding in Dubai during the last part of March and will be out of the country for a week – leaving her husband behind to care for her father. Due to the urgency of her father's care and numerous circumstances far beyond her control,<sup>1</sup> the undersigned counsel respectfully asks for more time to draft and file the Petition with this Court.

For these extraordinary reasons, Appellant respectfully asks that this Court would give her until April 7, 2025, to file her Petition for a Writ of Certiorari.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/Ainsley F. Tillman

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March 17, 2025

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<sup>1</sup> If this Court requires further detail, I am glad to provide it.

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