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Mar 17 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Mikell R. Scarborough, Master-in-Equity

Court of Appeals Case No. 2021-001014

Bonnie Wall, individually and derivatively,
and Walter B. Wall, Jr.....Appellants,

v.

Jonathan Dye, Shaun Dye, Shellmore Homeowners' Association, Inc., and
John H. Chakides, Jr., individually and
in his capacity as Director of Shellmore Homeowners' Association, Inc.,
.....Respondents.

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

On February 5, 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 March 7, 2025. This Court kindly granted Appellants a first extension of twenty days in which to file her petition for a writ of certiorari, making the Petition due on March 27, 2025. Pursuant to Rules 240 and 263, SCACR, Appellants Bonnie Wall, individually and derivatively, and Walter B. Wall, Jr., hereby respectfully move for a second extension of time in which to serve and file their Petition for Writ of Certiorari (the "Petition"). Appellants respectfully requests an extension of twenty (20) days to serve and file their Petition. If granted as requested, the Petition would then be due to be served and filed on April 16, 2025.

This motion is made in good faith and not for the purpose of delay. Counsel for Appellants 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, the undersigned 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. Thus, due to the urgency of her father’s care and numerous circumstances beyond her control,¹ the undersigned counsel respectfully asks for more time to draft and file the Petition with this Court.

For these extraordinary reasons, Appellant respectfully requests that this Court would give her until April 16, 2025, to file her Petition for a Writ of Certiorari.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/Ainsley F. Tillman

Ainsley F. Tillman, SC Bar No. 70551

Ainsley.Tillman@FordWallace.com

715 King Street

Charleston, South Carolina 29403

(843) 277-2011

Attorneys for Appellants

¹ If this Court requires further detail, I am glad to provide it.

Charleston, South Carolina
March 17, 2025

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PROOF OF SERVICE

I certify that on March 17, 2025, I have served the above Motion for Extension of Time on Respondents by sending the same to their attorneys of record at their email addresses of record with the AIS, contemporaneously with electronic filing with the Supreme Court.

s/ Ainsley F. Tillman