

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

Appeal from Charleston County
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2025-000394
Circuit Court Case No. 2021-CP-10-00785

The Wolf Marie Vernon Trust,

Petitioner,

v.

The Town of Mount Pleasant and the Mount Pleasant Board of
Zoning Appeals,

Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE
RETURN TO PETITION FOR WRIT OF CERTIORARI**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No.: 66468)
Brian L. Quisenberry (SC Bar No.: 73637)
Russell G. Hines (SC Bar No.: 72100)
25 Calhoun Street, Suite 400
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P.O. Box 993, Charleston, SC 29402
(843) 720-5488
Attorneys for Respondents

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA SUPREME COURT

COME NOW Respondents The Town of Mount Pleasant and the Mount Pleasant Board of Zoning Appeals, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their return to the petition for writ of certiorari in this matter.

Pursuant to Rule 242(f), SCACR, the present deadline for Respondents' return to the petition for writ of certiorari is Wednesday, April 2, 2025. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Respondents requests ten (10) additional days to prepare Respondent's return to the petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Respondents move this Honorable Court to grant them an extension of 10 days' time to file/serve their return to the petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving their return to the petition for writ of certiorari would be April 14, 2025, according to the undersigned's calculations. Further, Respondents respectfully request the Court hold their present deadline in abeyance until it acts upon this motion.

[Signature on next page]

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown* _____

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Charleston, South Carolina

April 1, 2025

**THE STATE OF SOUTH CAROLINA
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Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Respondents

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO THE PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on April 1, 2025, via email (see attached) to their following counsel of record:

Thomas J. Rode (thomas@tktlawyers.com)
Thurmond Kirchner & Timbes, P.A.
15 Middle Atlantic Wharf
Charleston, SC 29401
Attorneys for Appellant

I also certify that Respondents' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on April 1, 2025, via email (see attached) to ctappfilings@sccourts.org.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Stephen L. Brown
Stephen L. Brown (SC Bar No. 66468)
Attorneys for Respondents

Charleston, South Carolina

April 1, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, April 1, 2025 4:14 PM
To: thomas@tktlawyers.com; kaitlyn@tktlawyers.com; michael@tktlawyers.com
Cc: Brown, Stephen L.; Hines, Russell; Quisenberry, Brian; Justman, Aimee
Subject: Wolfe Marie Vernon Trust v. Town of Mount Pleasant; Sup. Ct. Case No. 2025-000394, Ct. App. Case No. 2022-000392 (CR 210600)
Attachments: Motion for Extension - 1st - Return to Petition for Writ.pdf

Enclosed please find Respondents' Motion for Extension of Time to File/Serve Return to Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
Project Assistant
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