

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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OCT 28 2014

S.C. SUPREME COURT

Appeal from Charleston County
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Circuit Court Case No. 2010-CP-10-7699
Appellate Case No. 2013-000084 (Court of Appeals)
Appellate Case No. 2014-002057 (Supreme Court)

Jane Doe,

Petitioner,

v.

Charles Smith, Charleston County School District
and James Island High School,

Respondents.

RESPONDENTS' MOTION FOR EXTENSION OF TIME

SENN LEGAL, LLC
Robin L. Jackson (SC Bar No. 16948)
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P.O. Box 12279 (29422)
(843) 556-4045
*Attorneys for Respondent Charles
Smith*

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Wilbur E. Johnson (SC Bar No. 3062)
Brian L. Quisenberry (SC Bar No. 73637)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
*Attorneys for Respondents
Charleston County School District
and James Island High School*

TO: THE HONORABLE JUDGES OF THE SUPREME COURT OF
SOUTH CAROLINA

COME NOW all Respondents (i.e., Charleston County School District, James Island High School, and Charles Smith), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move this Honorable Court for an extension of one (1) week's time to file and serve their Return(s)¹ to the Petition for Writ of Certiorari by Petitioner Jane Doe.

The Petition for Writ of Certiorari was served on September 24, 2014; thereby, making Respondents' Return(s) to the Petition due on October 24, 2014, pursuant to Rule 242(f), SCACR. In light of other time commitments, the undersigned respectfully request that Respondents' deadline for filing and serving their Return(s) to the Petition be extended by 1 week from October 24, 2014, i.e., through October 31, 2014. Respectfully, Respondents submit that this relief is consistent with the interests of justice and will not work any undue prejudice upon Petitioner.

WHEREFORE, Respondents respectfully request that this Honorable Court grant them an extension of 1 week's time to file/serve their Return(s) to the Petition for Writ of Certiorari in this matter. With the requested extension, the new deadline for Respondent's Return(s) would be October

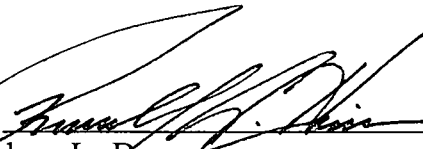
¹ Respondents are still determining if they will submit a single, joint Return or separate Returns.

31, 2014. Further, Respondents respectfully request that the Court hold the present deadline for their Return(s) in abeyance until it acts upon this motion.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 
Stephen L. Brown (SC Bar No. 66468)

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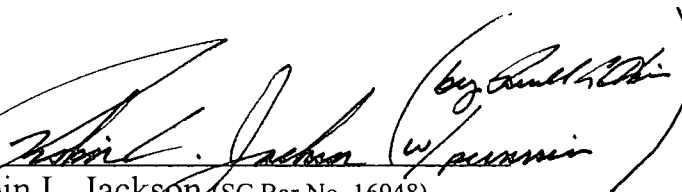
Attorneys for Respondents

Charleston County School District

and James Island High School

-and-

SENN LEGAL, LLC

By: 
Robin L. Jackson (SC Bar No. 16948)

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Charleston, South Carolina 29407

P.O. Box 12279 (29422)

(843) 556-4045

Attorneys for Respondent Charles

Smith

Charleston, South Carolina

Dated: 10/24/14

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Respondents.

PROOF OF SERVICE

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*Attorneys for Respondents
Charleston County School District
and James Island High School*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondents Charleston County School District and James Island High School, do hereby certify that I have served **Respondents' Motion for Extension of Time** on all other parties to this case by depositing a copy of the same in the United States Mail, postage prepaid, on October 24, 2014, addressed as follows to their counsel of record:

Lawrence E. Richter, Jr., Esquire
Alice Richter Lehrman, Esquire
Aaron E. Edwards, Esquire
The Richter Firm, LLC
622 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29464
Attorneys for Petitioner

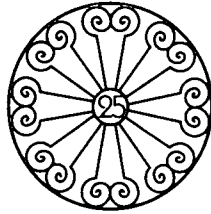
Robin L. Jackson, Esquire
Senn Legal, LLC
3 Wesley Drive
Charleston, SC 29407
Attorneys for Respondent Charles Smith

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 10/24/14



YCR LAW
Young Clement Rivers, LLP

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
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E-mail: kbarnes@ycrlaw.com

October 24, 2014

RECEIVED

OCT 28 2014

Honorable Daniel E. Shearouse, Clerk
South Carolina Supreme Court
P. O. Box 11330
Columbia, SC 29211-1330

S.C. SUPREME COURT

Re: Jane Doe v. Charles Smith, Charleston County School District and James Island
High School
Appellate Number: 2014-002057
Case No.: 2010-CP-10-7699
Claim No.: 46138
Date of Loss: 9/1/1988
YCR File: 2235-20080353

Dear Honorable Shearouse:

Enclosed please find the original and seven (7) copies of Respondents' Motion for Extension of Time and the original and two (2) copies of the Proof of Service of same with regard to the Return to the Petition for Writ of Certiorari. Also enclosed is our firm's check in the amount of \$25.00 representing the filing fee.

Please return one (1) clocked copy of each document to us in the self-addressed, stamped envelope provided.

With best wishes and kindest regards, I am

Sincerely,

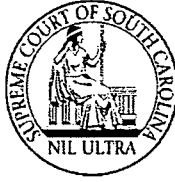
YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

/kbb

Enclosures

cc: Robin L. Jackson, Esquire, Senn Legal, LLC
Lawrence E. Richter, Jr., Esquire, The Richter Firm, LLC
Alice Richter Lehrman, Esquire, The Richter Firm, LLC
Aaron E. Edwards, Esquire, The Richter Firm, LLC



The Supreme Court of South Carolina

Young, Clement, Rivers

10/28/2014

RECEIPT #73981

Case No: 2014-002057
Case Short Title: Jane Doe v. Charles Smith
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 153892
Check/Money Order Date: 10/23/2014
Comments: