

RECEIVED

NOV 04 2014

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

S.C. SUPREME COURT

Appeal from Charleston County
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

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

Jane Doe,

Petitioner,

v.

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

Respondents.

RESPONDENTS' SECOND MOTION FOR EXTENSION OF TIME

SENN LEGAL, LLC
Robin L. Jackson (SC Bar No. 16948)
3 Wesley Drive
Charleston, South Carolina 29407
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 JUSTICES 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 hereby move this Honorable Court for another (i.e., second) extension of one (1) week's time to serve and file their Return(s)¹ to the Petition for Writ of Certiorari by Petitioner Jane Doe.

The Petition was served on September 24, 2014; thereby, making Respondents' Return(s) due by October 24, 2014, pursuant to Rule 242(f), SCACR. By Order filed October 28, 2014, this Court granted Respondents' first motion for a 1-week extension of time, allowing Respondents until October 31, 2014, to serve and file their Return(s).

Although Respondents believed in good faith that the relief requested via their first motion for extension of time would be sufficient and did not, when making that motion, anticipate needing to make another such motion, again, in light of other time demands (both of a work-related and personal nature), the undersigned respectfully request that Respondents' deadline for filing and serving their Return(s) to the Petition be extended by 1 more

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

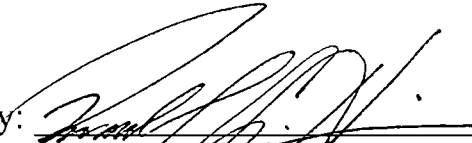
week: from October 31, 2014, through November 7, 2014. Respectfully, Respondents submit that this relief is consistent with the interests of justice, will not cause any undue delay in this matter, and will not prejudice Petitioner.

WHEREFORE, Respondents respectfully request that this Honorable Court grant them a second extension of 1 week's time to serve and file their Return(s) to the Petition for Writ of Certiorari in this matter. With the extension requested herein, the new deadline for Respondent's Return(s) would be November 7, 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>

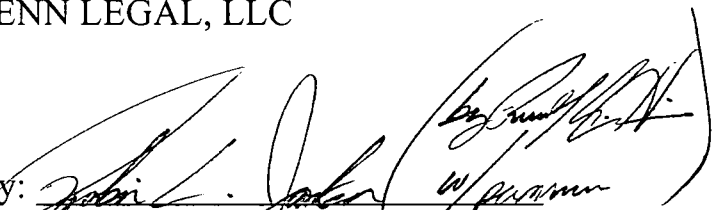
Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

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

-and-

SENN LEGAL, LLC

By: 
Robin L. Jackson (SC Bar No. 16948)
3 Wesley Drive
Charleston, South Carolina 29407
P.O. Box 12279 (29422)
(843) 556-4045
***Attorneys for Respondent Charles
Smith***

Charleston, South Carolina

Dated: 10/31/14

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

Appeal from Charleston County
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

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

Jane Doe,

Petitioner,

v.

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

Respondents.

PROOF OF SERVICE

SENN LEGAL, LLC
Robin L. Jackson (SC Bar No. 16948)
3 Wesley Drive
Charleston, South Carolina 29407
P.O. Box 12279 (29422)
(843) 556-4045
*Attorneys for Respondent Charles
Smith*

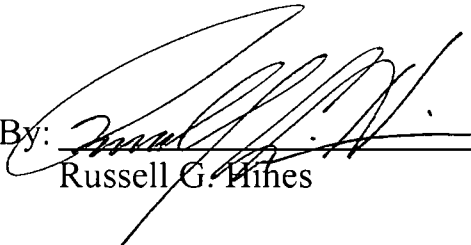
YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Wilbur E. Johnson (SC Bar No. 3062)
Brian L. Quisenberry (SC Bar No. 73637)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
*Attorneys for Respondents
Charleston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

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' Second 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 31, 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

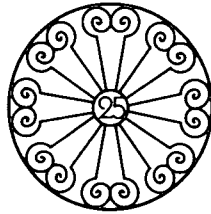
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines

Charleston, South Carolina

Dated: 10/31/14



YCR LAW
Young Clement Rivers, LLP

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

October 31, 2014

RECEIVED

NOV 04 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 Mr. Shearouse:

Enclosed please find the original and seven (7) copies of Respondents' Second Motion for Extension of Time to serve and file the Return to the Petition for Writ of Certiorari, along with the original and two (2) copies of the Proof of Service of same.

Also enclosed is our firm's check in the amount of \$25.00 representing the filing fee. Please return a clocked copy of both documents to me in the enclosed self-addressed stamped envelope.

With best wishes and kindest regards, I am

Sincerely,

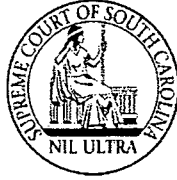
YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

/kbb

Enclosures

cc: 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
Robin L. Jackson, Esquire, Senn Legal, LLC



The Supreme Court of South Carolina

Young, Clement, Rivers

11/04/2014

RECEIPT #74055

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: 154038
Check/Money Order Date: 10/31/2014
Comments: