

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Appeal from Charleston County  
Court of Common Pleas

NOV 12 2014

**S.C. SUPREME COURT**

W. Jeffrey Young, Circuit Court Judge

Opinion No. 2014-UP-267 (S.C. Ct. App. filed June 30, 2014)

Jane Doe,

Petitioner,

v.

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

Respondents.

**RESPONDENTS CHARLESTON COUNTY SCHOOL DISTRICT  
AND JAMES ISLAND HIGH SCHOOL'S  
THIRD—AND FINAL—MOTION FOR AN EXTENSION OF TIME**

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)  
P.O. Box 993  
Charleston, South Carolina 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 Respondents Charleston County School District and James Island High School (collectively, “Respondents”), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby move this Honorable Court for another (i.e., third, and final) extension of time to file and serve their Return<sup>1</sup> to the Petition for Writ of Certiorari by Petitioner Jane Doe.

The Petition was served on September 24, 2014; thereby, making Respondents’ Return due by October 24, 2014, pursuant to Rule 242(f), SCACR. The Court has twice previously extended Respondents’ Return deadline. First, to October 31 (by Order filed October 28); then, to November 7 (by Order filed November 5), which is the present deadline.

Although Respondents believed in good faith that the relief requested via both of their prior motions for extension of time would be sufficient, and did not, when making either 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 requests that

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<sup>1</sup> In making their prior motions for extension, Respondents noted that they were still determining if they would submit a single, joint Return with co-Respondent Charles Smith or a separate Return. Respondents have now determined that they will submit a separate Return.

Respondents' deadline for filing and serving their Return to the Petition be extended a final time.

Although Respondents' Return is nearing completion and will be ready for filing and service in fewer than five (5) days, in accordance with the Court's Order of July 16, 2014 (Re: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals), Respondents ask for a final extension of five (5) days' time, i.e., the minimum time period that can be requested under the Court's Order, and for that extension to be calculated without excluding the intervening weekend. That is, Respondents ask for their Return deadline to be extended until November 12, 2014, which is the nineteenth (19<sup>th</sup>) total day since their Return was originally due, i.e., without any extension, on October 24.

Respectfully, and, to be sure, most humbly, 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. Also, Respondents expressly recognize that, should this relief be granted, they will not be allowed any other extension in this matter absent extraordinary circumstances.

WHEREFORE, Respondents request that this Honorable Court grant

them a final extension of time, allowing Respondents until November 12, 2014, to file and serve their Return to the Petition for Writ of Certiorari in this matter. Further, Respondents request that the Court hold the present deadline for their Return in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

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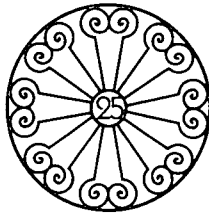
*Attorneys for Respondents*

*Charleston County School District*

*and James Island High School*

Charleston, South Carolina

Dated: 11/7/14



**YCR LAW**  
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November 7, 2014

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NOV 12 2014

**S.C. SUPREME COURT**

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

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

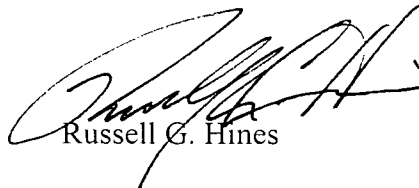
Dear Mr. Shearouse:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of Respondents Charleston County School District and James Island High School's Third – And Final – Motion for An Extension of Time. Also enclosed are the original and one (1) copy of a proof of service regarding the same and a check in the amount of \$25.00 to cover the costs associated with this request.

Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

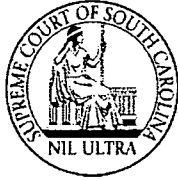


Russell G. Hines

RGH/amj

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

Russell Grainger Hines  
PO Box 993  
Charleston SC 29402-0993

11/12/2014

## RECEIPT #74125

**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:** 154168  
**Check/Money Order Date:** 11/07/2014  
**Comments:**