

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

JAN 20 2015

Clifton B. Newman, Circuit Court Judge

S.C. Supreme Court

Appellate Case No. 2014-002743

Fatima Karriem, through her court-appointed guardian, Phillip.....Petitioner.
Simmons

v.

Sumter County Disabilities and Special Needs Board,.....Respondent,

**MOTION FOR EXTENSION OF TIME TO FILE
REPLY TO PETITION FOR WRIT OF CERTIORARI**

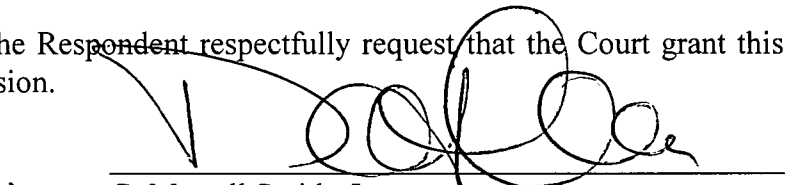
The Respondent, by and through their undersigned attorney, requests that they be granted a 15 day extension to file their Reply to Petition for Writ of Certiorari.

The basis of this motion is that the Court of Appeals determined that the Appellant failed to preserve the issue of premises liability. Pursuant to Pon, L.L.C. v. Town of Mt. Pleasant, 38 S.C. 406, 422, 526 S.E.2d 716, 724 (2000), this will require additional briefing from the Respondent.

Furthermore, the undersigned commences Legislative Session on January 13, 2015 and needs additional time to prepare the Reply.

Therefore, the attorney for the Respondent respectfully request that the Court grant this motion and allow for a 15 day extension.

January 13, 2015


G. Murrell Smith, Jr.
S.C. Bar No. 66263

Lee, Erter, Wilson, James, Holler & Smith, L.L.C.
126 North Main Street
Post Office Box 580
Sumter, South Carolina 29151
803-778-2471
ATTORNEY FOR THE RESPONDENT

Other Counsel of Record:

John R. Moorman
The Bryan Law Firm of S.C., LLP
Post Office Box 2038
Sumter, South Carolina 29151

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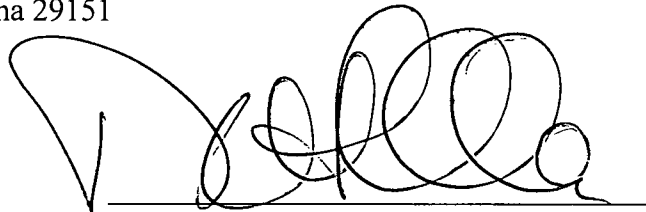
Sumter County Disabilities and Special Needs Board,.....Respondent,

Proof of Service

I certify that I have served upon Petitioner a copy of the foregoing Respondent's Motion for Extension of Time to File Reply to Petition for Writ of Certiorari by depositing the same today in the United States mail, postage prepaid, addressed to:

John R. Moorman
J. Thomas McElveen, III
Bryan Law Firm of SC, L.L.P.
Post Office Box 2038
Sumter, South Carolina 29151

January 13, 2015



G. Murrell Smith, Jr.
S.C. Bar No. 66263
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Post Office Box 580
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(803) 778-2471
Attorney for Respondent

Per

Lee, Erter, Wilson, Holler & Smith, L.L.C.

Jack W. Erter, Jr.
Harry C. Wilson, Jr.
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January 13, 2015

Honorable Daniel E. Shearhouse
Clerk of Court, The Supreme Court of South Carolina
Post Office Box 11330
Columbia, SC 29211
ATTENTION: Brenda F. Shealy

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JAN 20 2015

S.C. Supreme Court

IN RE: Fatima Karriem v. Sumter County Disabilities and Special Needs Board
Appellate Case No.: 2014-002743

Dear Mr. Shearhouse:

Enclosed herewith please find Respondent's Motion for Extension of Time to File Response to Petitioner's Petition for Writ of Certiorari along with Proof of Service in the above matter. I have also enclosed a check for \$25.00 to cover the filing fee for the same.

If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,



G. MURRELL SMITH, JR.

GMSjr:bt
Enc.

cc: John R. Moorman, Esquire
Shanta Weston, IRF No. 27505



The Supreme Court of South Carolina

Lee Erter Wilson Holler Smith

01/20/2015

RECEIPT #74795

Case No: 2014-002743
Case Short Title: Fatima Karriem v. Sumter County Disabilities
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 45333
Check/Money Order Date: 01/13/2015
Comments: