

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

Appeal from Lancaster County  
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

---

Opinion No. 5028 (S.C. Ct. App. Filed Aug. 29, 2012)

---

RECEIVED

MAR 11 2015

S.C. Supreme Court

Travis A. Roddey, as the Personal  
Representative of the Estate of  
Alice Monique Beckham Hancock,.....Petitioner,

v.

Wal-Mart Stores East, LP, U.S. Security  
Associates, Inc., and Derrick L. Jones,.....Respondents.

---

**RESPONDENTS' MOTION FOR EXTENSION OF  
TIME TO FILE BRIEF OF RESPONDENTS**

---

Pursuant to Rule 263 of the South Carolina Appellate Court Rules, the Respondents herewith jointly move the Court for an order granting them a thirty (30) day extension of time in which to file Respondents' Brief. Respondents request this extension due to multiple conflicts arising in other legal matters in which counsel for Respondents are involved, including preparation in connection with a recent trial and frequent out-of-town travel.

Petitioner's Brief was served by mail on February 13, 2015. Accordingly, the Respondents' Brief is currently due on or before March 16, 2015. With a thirty (30) day extension, Respondents' Brief would be due on or before April 15, 2015.

The undersigned counsel for Respondents has consulted with Counsel for Petitioner, who has stated that he has no objection to this request.

Wherefore, Respondents respectfully pray for an Order granting an extension of time until April 15, 2015, in which to file Respondents' Brief.

Respectfully submitted,

March 10, 2015



W. Howard Boyd, Jr. (S. C. Bar # 826)

Stephanie Flynn (S.C. Bar # 16653)

GALLIVAN, WHITE & BOYD, P.A.

55 Beattie Place, Suite 1200

P.O. Box 10589

Greenville, SC 29603

(864) 271-9580

(864) 271-7502 FAX

[hboyd@gwblawfirm.com](mailto:hboyd@gwblawfirm.com)

[sflynn@gwblawfirm.com](mailto:sflynn@gwblawfirm.com)

Attorneys for Respondents

**THE STATE OF SOUTH CAROLINA  
In the Supreme Court**

---

**Appeal from Lancaster County  
Court of Common Pleas**

Brooks P. Goldsmith, Circuit Court Judge

---

Opinion No. 5028 (S.C. Ct. App. Filed Aug. 29, 2012)

---

Travis A. Roddey, as the Personal  
Representative of the Estate of  
Alice Monique Beckham Hancock,.....Petitioner,

v.

Wal-Mart Stores East, LP, U.S. Security  
Associates, Inc., and Derrick L. Jones,.....Respondents.

---

**PROOF OF SERVICE**

---

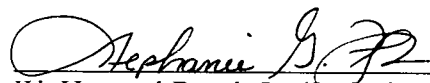
The undersigned hereby certifies that on the 10<sup>th</sup> day of March, a copy of Respondents' Motion for Extension of Time to File Respondents' Brief was served by placing a copy of the Motion in an envelope with sufficient postage prepaid, and mailing it to counsel for Petitioner as follows:

Blake A. Hewitt, Esq.  
Bluestein, Nichols, Thompson & Delgado, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202

S. Randall Hood, Esq.  
William A. McKinnon, Esq.  
McGowan, Hood, Felder & Johnson, L.L.C.  
1539 Health Care Drive  
Rock Hill, SC 29732

Brent P. Stewart, Esq.  
Stewart & Love  
P.O. Box 670  
Rock Hill, SC 29731-6670

March 10, 2015



---

W. Howard Boyd, Jr. (S. C. Bar # 826)  
Stephanie Flynn (S.C. Bar # 16653)  
GALLIVAN, WHITE & BOYD, P.A.  
55 Beattie Place, Suite 1200  
P.O. Box 10589  
Greenville, SC 29603  
(864) 271-9580  
(864) 271-7502 FAX  
[hboyd@gwblawfirm.com](mailto:hboyd@gwblawfirm.com)  
[sflynn@gwblawfirm.com](mailto:sflynn@gwblawfirm.com)

Attorneys for Respondents

Stephanie G. Flynn  
A member of the South Carolina Bar  
Direct 864.271.5426  
SFlynn@GWBlawfirm.com



**Gallivan, White & Boyd, P.A.**  
ATTORNEYS AT LAW

55 Beattie Place, Suite 1200  
Post Office Box 10589 (29603)  
Greenville, South Carolina 29601  
Telephone 864.271.9580  
Facsimile 864.271.7502  
www.GWBlawfirm.com

March 10, 2015

**VIA FACSIMILE &  
FEDERAL EXPRESS**

The Honorable Daniel E. Shearhouse  
Clerk of Court  
Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211

**RECEIVED**

MAR 11 2015

**S.C. Supreme Court**

Re: Travis A. Roddey, Individually and as the Personal Representative of the Estate of Alice Monique Beckham Hancock, deceased v. Wal-Mart Stores East, LP, U.S. Security Associates, Inc. and Derrick L. Jones  
C.A. No.: 2007-CP-29-0593  
Case Tracking No. 2012-213375

Dear Mr. Shearhouse:

In connection with the appeal of the above-referenced case, we are writing to request a 30-day extension of time to file Respondents' Brief. Respondents' Brief is currently due on March 16, 2015. Accordingly, by our calculations, an extension will result in a new due date of April 15, 2015.

This extension is necessitated by conflicts arising in multiple other legal matters, including trial preparation and out-of-town travel. Enclosed you will find the original and six copies of Respondents' Motion for Extension of Time, Proof of Service, and our firm's check in the amount of \$25.00 for the filing fee for this extension.

We have consulted with counsel for the Petitioner, Blake A. Hewitt, who has indicated that he has no objection to it. By copy of this letter, we are notifying Mr. Hewitt of our communication with the Court and our action in making this request for a 30-day extension.

Thank you very much for your attention to this matter. Should you have any questions or concerns regarding this request, please do not hesitate to contact me.

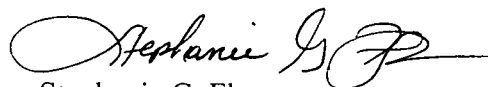
The Honorable Daniel E. Shearhouse  
March 10, 2015

---

With kind regards,

Very truly yours,

GALLIVAN, WHITE & BOYD, P.A.



Stephanie G. Flynn

*Direct Dial: (864) 271-5426*

*sflynn@gwblawfirm.com*

SGF/

Enclosures

cc: Blake A. Hewitt, Esq. (w/encls.)  
William A. McKinnon, Esq. (w/encls.)  
Brent P. Stewart, Esq. (w/encls.)