

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

APR 14 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, and
Derrick L. Jones, Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, the petitioner requests a 10-day extension of the deadline for filing and serving his reply brief. The current deadline is April 16, 2015.

This case is a certiorari case, which means that this request is governed by the Court's order *RE: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals*, S.C. Sup. Ct. Order dated July 16, 2014 (Shearouse Adv. Sh. No. 28 at 1).

The grounds for this request are that the petitioner's counsel does not expect to be able to complete a satisfactory reply brief within the current deadline, which is Thursday.

The petitioner has requested one previous extension in this case; a 15-day extension of the deadline for the certiorari petition, which the Court granted in November of 2012.

While a grant of this 10-day extension would fall outside the cumulative extension limit of 20 days, the Court's order articulates that a party may request a single extension of 10 days if there were prior extension requests in the case and if those extension requests predated the Court's order. That situation applies here.

Counsel for the respondents have consented to this request.

April 14, 2015

Respectfully submitted, .



Blake A. Hewitt, SC Bar # 73674

John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, SC 29202

(803) 779-7599

(803) 779-8995 (facsimile)

bhewitt@bntdlaw.com

jsnichols@bntdlaw.com

Attorneys for Petitioner

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

APR 14 2015

Opinion No. 5028 (S.C. Ct. App. filed Aug. 29, 2014). **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, and
Derrick L. Jones, Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Respondents with a copy of the *Motion for Extension* by mailing copies of
the same by United States Mail with first class postage prepaid to the following address:

W. Howard Boyd, Jr., Esquire
Stephanie G. Flynn, Esquire
GALLIVAN, WHITE & BOYD, P.A.
Post Office Box 10589
Greenville, South Carolina 29603



Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC

April 14, 2015



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

April 14, 2015

RECEIVED

APR 14 2015

S.C. Supreme Court

VIA HAND DELIVERY

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

RE: Roddey v. Wal-Mart Stores East
Case Tracking No.: 2012-213375

Dear Mr. Shearouse:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in regards to this case. I have also enclosed a proof of service of this document on counsel for the respondents and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

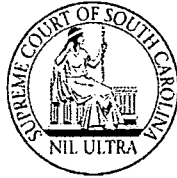
Sincerely,

Erin Bridges
Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: William A. McKinnon, Esquire
Brent P. Stewart, Esquire
Stephanie G. Flynn, Esquire



The Supreme Court of South Carolina

John S. Nichols
1614 Taylor St.
Columbia SC 29201

04/14/2015

RECEIPT #75679

Case No:	2012-213375
Case Short Title:	Travis Roddey v. Wal-Mart Stores
Event:	Motion - Extension of Time (1st)
Fee Type:	Motion Fee
Amount:	\$25.00
Payment Type:	Check
Reference No:	4499
Check/Money Order Date:	04/14/2015
Comments:	