

STATE OF SOUTH CAROLINA
In the South Carolina Supreme Court

APPEAL FROM YORK COUNTY
COURT OF COMMON PLEAS

JOHN C. HAYES, III, CIRCUIT COURT JUDGE

RECEIVED
JAN 15 2016
SC SUPREME COURT

On Petition for Writ of Certiorari
to the Court of Appeals of South Carolina
Opinion No. 2015-UP-414

Appellate Case No. 2015-002345

Christopher A. Wellborn.....Petitioner,
v.
The City of Rock Hill.....Respondent.

MOTION TO FILE
RETURN TO PETITION FOR
WRIT OF CERTIORARI
OUTSIDE OF TIME

Respondent moves before this Honorable Court to file the Return to Petition for Writ of Certiorari outside of time.

Petitioner forwarded his Petition for Writ of Certiorari to Respondent on November 13, 2015 and filed it with the South Carolina Supreme Court. Respondent's attorney erroneously calendared the response for mid-December. Unable to complete and forward the document to opposing counsel and the Court as planned because of an abbreviated work schedule regarding multiple doctors' appointments; docketing, trial, and preparation work for monthly jury trial terms and additional court session obligations; and, a mandatory city employee administrative project that consumed the better part of a week's time, the City has completed the required documents and begs leave of this Honorable Court to file same outside of time.



Paula Knox Brown
Attorney for Respondent
201 E. Main Street, Suite 300
Rock Hill, South Carolina 29730
803-329-5641

January 13, 2016
Rock Hill, SC

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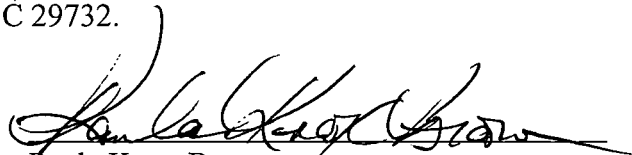
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CERTIFICATE OF SERVICE

I, Paula Knox Brown, hereby certify that I served the Respondent's *Return to Petition for Writ of Certiorari* and *Motion to File Return to Petition for Writ of Certiorari Outside of Time* on Counsel for Appellant, James Boyd, Esquire, by depositing a copy of the document in the United States mail, with sufficient postage affixed, on the 13th day of January, 2016. The envelope was addressed as follows:

James W. Boyd, Esquire
Post Office Box 36425
1544 Ebenezer Road
Rock Hill, SC 29732.



Paula Knox Brown
Attorney for Respondent
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