

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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The Honorable Roger M. Young  
Case No. 2011-CP-400

**RECEIVED**

FEB 23 2016

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Unpublished Opinion No. 2015-UP-491  
Filed October 14, 2015

**S.C. SUPREME COURT**

Appellate Case No. 2016-000065

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Jacquelin S. Bennett, Genevieve S. Felder and Kathleen S. Turner, individually, as Co-Trustees and beneficiaries of the Marital Trust and the Qualified Terminable Interest Trust created by the Thomas Stevenson Will, and Jacquelin S. Bennett, and Kathleen S. Turner, as Co-Personal Representatives on behalf of the Estate of Jacquelin K. Stevenson

Appellants,

v.

T. Heyward Carter, Jr.; Evans, Carter; Kunes & Bennett, P.A.; Dixon-Hughes f/k/a Pratt-Thomas Gumb & Co., P.A.; and Lynne L. Kerrison

Defendants,

Of Whom

Dixon-Hughes and Lynne L. Kerrison are

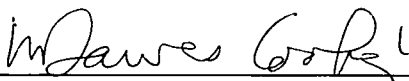
Petitioners/Respondents.

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**Motion for Extension of Time to Serve Reply to Petition for Writ of Certiorari**

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BARNWELL WHALEY PATTERSON & HELMS, LLC

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Jeremy E. Bowers, Esquire  
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ATTORNEYS FOR THE PETITIONERS

February 22, 2016  
Charleston, South Carolina

Other Counsel of Record:

A. Camden Lewis, Esquire  
Keith M. Babcock, Esquire  
James M. Griffin, Esquire  
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COME NOW, the Petitioners (“Petitioners”) with the written consent of the Respondents, pursuant to Rule 263(b) and Rule 240 of the South Carolina Appellate Court Rules, and respectfully move the Supreme Court for a ~~four (4)~~ <sup>five (5)</sup> day extension of time to serve their reply brief to the Petition for Writ of Certiorari for the reasons and good cause set forth below:

1. Pursuant to Rule 242(g), SCACR, Petitioners’ Reply Brief to the Petition for Writ of Certiorari is due to be filed on or before February 22, 2016.

2. Petitioners file this motion requesting a four (4) day extension to file their Reply Brief to the Petition for Writ of Certiorari. Petitioners have obtained the written consent of Respondents to this request for an extension of time.

3. Petitioners have taken exception to a number of rulings from the Court of Appeals, and Respondents have filed a lengthy brief in opposition to Petitioners’ Petition for a Writ of Certiorari.

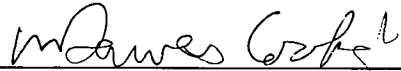
4. With the closure of mail delivery services for the holiday last week, Petitioners did not receive the Respondents’ Return to the Petition for a Writ of Certiorari until the middle of last week.

5. The Petitioners seek an extension of time to determine if a Reply to Respondents’ Return is required and, if so, to properly prepare their Reply to Respondent’s Return to the Petition for a Writ of Certiorari.

6. Petitioners have consulted with all counsel of record, and all counsel consent to Petitioners’ limited request for an extension of time. If the extension is granted, the Petitioners’ Reply Brief to the Petition for a Writ of Certiorari would be due on Friday, February 26, 2016.

Therefore, for the foregoing reasons and with the consent of counsel for the Respondents, Petitioners respectfully ask this Court to grant it a four (4) day extension of time to file their Reply Brief to the Petition for Writ of Certiorari.

BARNWELL WHALEY PATTERSON & HELMS, LLC

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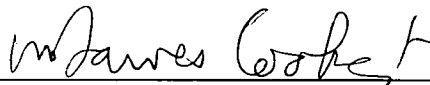
PROOF OF SERVICE

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I certify that on this 22<sup>nd</sup> day of February 2016, I have served on the Appellants' counsel a copy of the attached Motion for Extension of Time to Serve Reply to Petition for Writ of Certiorari by causing a copy of the same to be placed in the U.S. Mail, first-class postage paid, addressed to:

A. Camden Lewis, Esquire  
Keith M. Babcock, Esquire  
James M. Griffin, Esquire  
Ariail E. King, Esquire  
Lewis Babcock & Griffin, LLP  
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