

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

MAY 04 2016

APPEAL FROM HORRY COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable George C. James, Jr., Circuit Court Judge

Appellate Case No. 2014-001285

National Security Fire and Casualty Company.....Plaintiff,

v.

Rosemary Jenrette, a/k/a Rosemary Long Jenrette,
and Horry County State Bank.....Defendants,

of whom

Rosemary Jenrette, a/k/a Rosemary Long Jenrette,Appellant,

v.

Horry County State Bank.....Respondent.

APPELLANT’S MOTION FOR EXTENSION TO FILE
PETITION FOR WRIT OF CERTIORARI AND
ACCOMPANYING APPENDIX

The Appellant’s petition for rehearing in the captioned matter was denied by the South Carolina Court of Appeals on April 22, 2016. The Appellant’s position is that the decision of the South Carolina Court of Appeals is in conflict with prior decisions of the South Carolina Supreme Court which may well be the result of novel issues of fact and, perhaps, novel questions of law being presented. Consequently, the Appellant is informed and believes that a petition for a writ of certiorari to the South Carolina Supreme Court is proper in this instance.



Appellant's counsels' wife, mother, and office manager is currently in the process of undergoing an extensive chemotherapy and other treatment for metastatic breast cancer in the bone. The initial chemotherapy phase is scheduled to be concluded by June 7, 2016. At that time, hopefully, the oncology treatments will be in the form of antigens which should allow counsel more time to devote to the law practice. We are on the opinion that the facts necessitating our request for this continuance constitute good cause shown.

We, therefore, respectfully request a twenty (20) day extension of the deadline to file a petition for a writ of certiorari and its accompanying appendix from May 22, 2016, to June 11, 2016.

We thank the Court for its kind consideration of this request, and ask that current deadlines be stayed pending disposition of this motion.

DESCHAMPS LAW FIRM

By: 

William W. DesChamps, Jr.

SC Bar No.: 1658

E-mail: wwd@deschampsllaw.com

William W. DesChamps, III

SC Bar No.: 77150

E-mail: trey@deschampsllaw.com

1357 21st Avenue North, Suite 102

Myrtle Beach, South Carolina 29577

(843) 448-2391

Attorneys for Rosemary Jenrette

Myrtle Beach, South Carolina

May 3, 2016

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

MAY 04 2016

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

Appellate Case No. 2014-001285

National Security Fire and Casualty Company.....Plaintiff,

v.

Rosemary Jenrette, a/k/a Rosemary Long Jenrette,
and Horry County State Bank.....Defendants,

of whom

Rosemary Jenrette, a/k/a Rosemary Long Jenrette,Appellant,

v.

Horry County State Bank.....Respondent.

PROOF OF SERVICE

I certify that I have served one (1) copy of the Appellant's Motion for Extension of Time to File the Petition for Writ of Certiorari and Accompanying Appendix upon counsel for Respondent Horry County State Bank depositing a copy of the same in the United States Mail, postage prepaid, on May 3, 2016, to the following address:

Randall K. Mullins, Esquire
Jarrod E. Ownbey, Esquire
Mullins Law Firm
Post Office Box 585
N. Myrtle Beach, SC 29597

[SIGNATURE ON THE FOLLOWING PAGE]

Dated: May 3, 2016

DESCHAMPS LAW FIRM



William W. DesChamps, Jr.
William W. DesChamps, III
Attorneys for Appellant Rosemary Jenrette
a/k/a Rosemary Long Jenrette
1357 21st Avenue North, Suite 102
Myrtle Beach, South Carolina 29577
(843) 448-2391
E-mail: wwd@deschampsllaw.com
trey@deschampsllaw.com

DESCHAMPS LAW FIRM*
ATTORNEYS-AT-LAW

www.deschampslaw.com

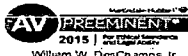
WILLIAM W. DESCAMPS, JR., ESQ.#^

WILLIAM W. DESCAMPS, III, ESQ.# *Martindale-Hubbell® Bar Register of Preeminent Lawyers™

PEGGY G. DESCAMPS, OFFICE ADMINISTRATOR

CERTIFIED CIRCUIT COURT MEDIATOR

^ CERTIFIED CIRCUIT COURT ARBITRATOR



1357 21ST AVENUE NORTH, STE. 102

P.O. BOX 2402 (29578)

MYRTLE BEACH, SC 29577

TELEPHONE: (843) 448-2391

FACSIMILE: (843) 448-3308

May 3, 2016

VIA NEXT DAY AIR DELIVERY

TRACKING NO.: 1Z F66 059 22 1001 555 3

RECEIVED

MAY 04 2016

SC Court of Appeals

The Honorable Daniel E. Shearouse
Clerk of Court for the South Carolina Supreme Court
Supreme Court Building
1231 Gervais Street
Columbia, South Carolina 29201

Re: Rosemary Jenrette a/k/a Rosemary Long Jenrette v. Horry County State Bank
Horry County Civil Action No.: 2011-CP-26-9199
Appellate Case No.: 2014-001285

Dear Mr. Shearouse:

I represent the Appellant, Rosemary Jenrette, whose petition for rehearing was denied April 22, 2016 by the South Carolina Court of Appeals, a copy of which is enclosed herewith. Our position is that the decision of the Court of Appeals is in conflict with prior decisions of the Supreme Court which may well be the result of novel issues of fact and, perhaps, novel questions of law being presented. Consequently, we are of the opinion that a petition for a writ of certiorari is proper in this instance. The service and filing of said writ and the accompanying appendix would be due on May 22, 2016.

The purpose of this letter and enclosed motion is to respectfully request a twenty (20) day extension of time to file and serve the petition for the writ of certiorari and the accompanying appendix making same due on or before June 11, 2016. The primary reason the request is being made is that my wife and office manager, Peggy DesChamps, is scheduled to continue with her chemotherapy treatments through June 7, 2016. At that time, hopefully, her oncology treatments will be in the form of antigens which should allow me more time to devote to my practice.

In accordance with the above, I enclose herewith the original and six (6) copies of the Appellant's motion for an extension of time to file the petition for writ of certiorari and the accompanying appendix. I also enclose herewith our firm's check in the amount of \$25.00 for the filing fee as well as an additional copy of the motion which I would appreciate your "clocking" and forwarding back to me in the self addressed stamped envelope provided for your convenience.

The Honorable Daniel E. Shearouse
May 3, 2016
Page 2

By copy of this letter and enclosures to opposing counsel of record and the Clerk of Court for the South Carolina Court of Appeals, we are serving them with a copy of this request and motion. I also enclose herewith my affidavit of service which is also being forwarded simultaneously herewith to the Clerk of Court for the South Carolina Court of Appeals.

If any additional information, documents, and/or fees are required to process this request please let me know at your earliest convenience.

Most Respectfully,

DESCHAMPS LAW FIRM


Wilfram W. DesChamps, Jr.

WWDjr: mjh

Enclosures

cc: Randall J. Mullins, Esquire
Jarrod E. Ownbey, Esquire
The Honorable Jenny A. Kitchings, Clerk of Court – S.C. Court of Appeals *
Rosemary Jenrette, Client

* VIA UPS NEXT DAY AIR DELIVERY TRACKING NO 1Z F66 059 22 1001 556 2

mely Urgent

This envelope

.com® or call 1-800-PICK-UPS® (1-800-742-5877)

Use a pickup or find a drop-off location near you.

Shipments

For the Letter rate, UPS Express Envelopes may only contain documents, urgent documents, and/or electronic media, and must weigh less than 10 lbs. or less. UPS Express Envelopes containing items other than documents.

International Shipments

UPS Express Envelopes may not be used to ship to certain countries or to ship goods for import or export to or from those countries.

For the Letter rate, UPS Express Envelopes weigh less than 10 lbs.

UPS Express Envelopes are not suitable for sensitive personal information.

Window

This envelope is not suitable for use with a dot matrix printer or a laser printer.

Insert shipping documents under window from the top.

Do not use this envelope for:

UPS Ground

WEIGHT	LTR <input checked="" type="checkbox"/>	PAK <input type="checkbox"/>	WEIGHT	DIMENSIONAL WEIGHT If Applicable	LARGE PACKAGE <input type="checkbox"/>	SHIPPER RELEASE <input type="checkbox"/>
--------	---	------------------------------	--------	----------------------------------	--	--

EXPRESS (INT'L)

DOCUMENTS ONLY

Shipper authorizes UPS to act as forwarding agent for export control and customs purposes.

Shipper certifies that these commodities, technology or software, if exported from the United States, were exported in accordance with the Export Administration Regulations. Diversion contrary to law is prohibited.

UPS Next Day Air®
UPS Worldwide Express®
Shipping Document

SATURDAY DELIVERY

SHIPMENT FROM
 UPS ACCOUNT NO. **F 6 6 0 5 9**

1Z F66 059 22 1001 556 2

1Z F66 059 22 1001 556 2

REFERENCE NUMBER
Jenrette L14-024

TELEPHONE
Melanie Houke 843-448-2391

DESCHAMPS LAW FIRM

1357 21ST AVE N RM 102

MYRTLE BEACH SC 29577 7446

MAY 04 2016
SC Court of Appeals

DELIVERY TO
Jenny A. Kitchings, Clerk of Court

TELEPHONE
South Carolina Court of Appeals

1220 Senate Street

Columbia, South Carolina 29201

UPS Next Day Air®

1Z F66 059 22 1001 556 2

1Z F66 059 22 1001 556 2

10101911202609 6/14 RRD
 United Parcel Service, Louisville, KY

SHIPMENT ID NUMBER **F660 5979 ZNH**

DATE OF SHIPMENT
5/3/16

