

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas

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

Supreme Court Case No. 2016-00915

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JUN 09 2016

S.C. SUPREME COURT

National Security Fire and Casualty Company, Plaintiff,

v.

Rosemary Jenrette, AKA Rosemary Long Jenrette and Horry County State Bank,
Defendants,

Of whom

Rosemary Jenrette, AKA Rosemary Long Jenrette is the Appellant,

and

Horry County State Bank is the Respondent.

RESPONDENT'S PETITION FOR AN EXTENSION OF TIME TO FILE RESPONDENT'S
RETURN TO PETITION FOR WRIT OF CERTIORARI

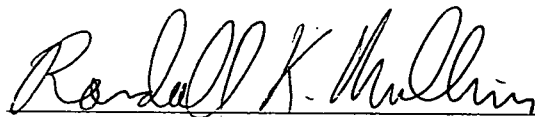
NOW COMES THE RESPONDENT, and would respectfully show and allege unto this
Honorable Court as follows:

1. That he is the attorney for the Respondent in the above-captioned matter;
2. That Respondent's Return to Petition for Writ of Certiorari is due on July 5, 2016;
3. That this is the first time Respondent has requested an extension of time to file a Petition for Extension of Time to File Respondent's Return to Petition for Certiorari;

4. That the mother of Respondent's counsel, Randall K. Mullins, Esquire, sustained multiple fractures to her femur in April while vacationing at his home;
5. That Respondent's counsel has had to provide for his mother's care while she underwent physical therapy and has thereby accumulated an extensive workload;
6. That during this same time period Respondent's counsel's law firm experienced a critical malfunction in the firm's server, which delayed work production for Two (2) days;
7. That for these reasons, in addition to other current pending deadlines and obligations, Respondent hereby requests a Thirty (30) day extension of time to file and serve Respondent's Return to Petition for Writ of Certiorari, causing the new deadline to be August 4, 2016; and
8. That further, the Respondent requests that all deadlines be stayed pending the outcome of this Petition.

I SO MOVE AND PETITION.

MULLINS LAW FIRM, P.A.



RANDALL K. MULLINS SC Bar No.: 6466
Attorney for the Respondent
Post Office Box 585
North Myrtle Beach, SC 29597
843.272.8902 Telephone
843.272.3075 Facsimile
mullinslawfirm@aol.com

Dated: June 7, 2016.
North Myrtle Beach, South Carolina

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Post Office Box 585
North Myrtle Beach
South Carolina 29597

Telephone 843.272.8902
Facsimile 843.272.3075
Mullinslawfirm@aol.com
Mullinslawfirm.com

S.C. SUPREME COURT

June 7, 2016

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

Re: National Security Fire and Casualty Company v. Rosemary Jenrette AKA
Rosemary Long Jenrette
Supreme Court Case No.: 2016-00915

Dear Clerk Shearouse:

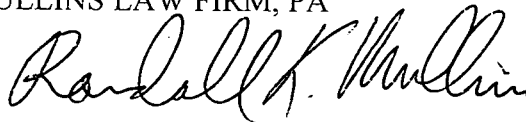
Enclosed please find Respondent's Petition for Extension of Time to File Respondent's Return to Petition for Writ of Certiorari in the above-referenced matter, together with a Proof of Service. In addition, I have enclosed our firm's check in the amount of \$25.00 as payment of the filing fee.

Thank you for your assistance, and if you require anything further, please do not hesitate to contact my office.

With warmest regards, I remain

Very truly yours,

MULLINS LAW FIRM, PA



Randall K. Mullins

RKM/klc

Enclosures

cc: William D. DesChamps, Jr., Esquire
William D. DesChamps, III, Esquire
Mr. Robert Smith
Ms. Sherry Grissett



The Supreme Court of South Carolina

Mullins Law

06/09/2016

RECEIPT #79835

Case No: 2016-000915
Case Short Title: National Security Fire and Casualty v. Rosemary Jenrette
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 14128
Check/Money Order Date: 06/07/2016
Comments:

Mullins Law Firm, PA
PO Box 585
Mt. Myrtle Beach SC 29597



Honorable Daniel E. Shearouse
Supreme Court of South Carolina
PO Box 11330
Columbia SC 29211-1330



\$0.675
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