

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

**RECEIVED**

JUL 14 2016

APPEAL FROM Horry COUNTY  
Court of Common Pleas

**S.C. SUPREME COURT**

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

Appellate Case No.: 2016-000915

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.....Petitioner,

Horry County State Bank .....Respondent.

PETITIONER'S MOTION FOR EXTENSION TO FILE  
REPLY TO RESPONDENT'S RETURN OF  
PETITION FOR WRIT OF CERTIORARI

Our office received Respondent's Return to Petition for Writ of Certiorari in the afternoon mail on Friday, July 8. According to the certificate of service, same was mailed on July 6, thereby making the return due Monday, July 18. Specifically due to family medical issues (Peggy DesChamps' ninth chemotherapy and related neupogen and fluids), we respectfully request an additional five (5) day extension of time to file Petitioner's Reply to Respondent's Return of Petition for Writ of Certiorari, thereby extending the deadline to Monday, July 25. The

1 

referenced chemotherapy treatment was originally scheduled for July 6, 7, 8, and 11 but, was postponed by the oncologist until the treatment period beginning July 12.

We are making this extension request due to the fact that attention to Peggy DesChamps' chemotherapy treatments should be addressed by Petitioners counsel during the Reply filing period. This is the first and will be the only request for an extension of time to file Petitioner's Reply to Respondent's Return of Petition for Writ of Certiorari as same can be prepared during the week of July 18. 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:   
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July 12, 2016

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PROOF OF SERVICE

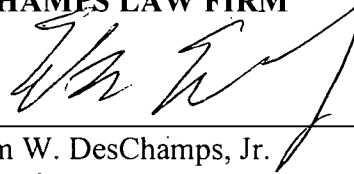
I certify that I have served one (1) copy of the Petitioner's Motion for Extension to file Reply to Respondent's Return of Petition for Writ of Certiorari upon counsel for Respondent Horry County State Bank by depositing a copy of the same in the United States Mail, postage prepaid, on July 12, 2016, to the following address:

Randall K. Mullins, Esquire  
Jarrod E. Ownbey, Esquire  
Mullins Law Firm  
1312 Madison Drive,  
N. Myrtle Beach, SC 29582

[SIGNATURE ON THE FOLLOWING PAGE]

Dated: July 12, 2016

**DESCHAMPS LAW FIRM**



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