

80276

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ABBEVILLE COUNTY
Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED

Court of Appeals Case No. 2015-002090

JUL 18 2016

SC Court of Appeals

William Crenshaw Appellant,

v.

Erskine College and David A. Norman Respondents.

PETITION FOR EXTENSION UNTIL JULY 19, 2016, TO FILE/SERVE
INITIAL BRIEF OF RESPONDENTS AND DESIGNATION OF MATTER

The Respondents, Erskine College and David A. Norman, pursuant to Rules 208(a)(2), 240, and 263(b) SCACR, petition this Honorable Court for an order extending the time to file the Initial Brief of Respondents by 3 business days until Tuesday, July 19, 2016. This Petition is the Respondents' third request for an extension, is made in good faith and not intended for delay, and is based on the following grounds:

1. By order of June 22, 2016, the Court granted Respondents a second extension of its initial briefing/designation of matter deadline, establishing a deadline of today, Thursday, July 14, 2016.

2. To be sure, the undersigned is cognizant of the notice in the Court's prior order that further extension of the initial briefing/designation deadline would have to be occasioned by extraordinary circumstances, and this motion is not made lightly.

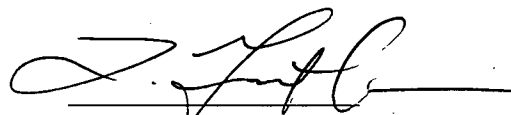
3. On account of greater-than-usual demands on counsels' time—professionally and otherwise, including Mr. Keim's continued work-related travel to perform collective bargaining for a week in Nevada, and the juggling of litigation and

substantial project deadlines for Mr. Close, as well as a week of illness wherein Mr. Close could not work a full schedule—the attorneys for Respondents find themselves in need of additional time to prepare the initial respondent’s brief and humbly request that the Court allow the modest extension where, counsel respectfully submits, it is consistent with the interests of justice and will not work any undue prejudice upon Appellant and, indeed, would be commensurate with the briefing schedule Appellant followed. The Respondents did not object to any of the Appellant’s three petitions for 30 day extensions to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal on account of their case load.

4. Appellant, through counsel, has graciously consented to Respondents’ petition for the modest extension requested herein.

Therefore, the Respondents respectfully request, with the consent of counsel for Appellant, an extension of 3 business days to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal, creating a new deadline of July 19, 2016.

Respectfully submitted this 14th day of July, 2016.



L. Grant Close III, Esquire
Thomas H. Keim, Jr., Esquire
FORD & HARRISON LLP
100 Dunbar Street, Suite 300
Spartanburg, SC 29306
Telephone: (864) 699-1100
Facsimile: (864) 699-1101
gclose@fordharrison.com
tkeim@fordharrison.com

Attorneys for Respondents

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM ABBEVILLE COUNTY
Eugene C. Griffith, Jr., Circuit Court Judge

JUL 18 2016

SC Court of Appeals

Court of Appeals Case No. 2015-002090

William Crenshaw Appellant,

v.

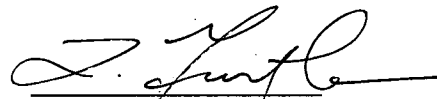
Erskine College and David A. Norman Respondents.

CERTIFICATE OF SERVICE OF
PETITION FOR EXTENSION UNTIL JULY 19, 2016, TO FILE/SERVE INITIAL
BRIEF OF RESPONDENTS AND DESIGNATION OF MATTER

I certify that I have served the Petition for Extension until July 19, 2016, to File/Serve Initial Brief of Respondents and Designation of Matter on the Appellant on July 14, 2016 by placing a copy in the United States Mail, postage prepaid, addressed to:

E. Charles Grose, Jr.
The Grose Law Firm, LLC
404 Main Street
Greenwood, SC 29646

Robert J. Tinsley, Sr.
R. Jamison Tinsley, Jr.
Tinsley & Tinsley, P.C.
P.O. Box 49145
Greenwood, SC 29649



L. Grant Close III, Esquire
FORD & HARRISON LLP
100 Dunbar Street, Suite 300
Spartanburg, SC 29306
Telephone: (864) 699-1100
Facsimile: (864) 699-1101



Writer's Direct Dial:

L. GRANT CLOSE III
864-699-1158
gclose@fordharrison.com

July 14, 2016

RECEIVED

JUL 18 2016

SC Court of Appeals

VIA UNITED STATES MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

Re: William Crenshaw v. Erskine College and David A. Norman
Court of Appeals Case No. 2015-002090

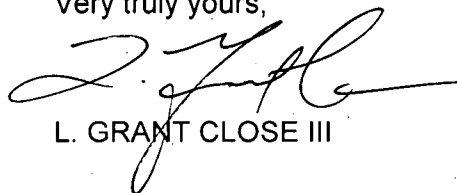
Dear Ms. Kitchings:

Please find enclosed, the original and six copies of Respondents' Petition for Extension until July 19, 2016, to File/Service Initial Brief of Respondents and Designation of Matter, along with the Certificate of Service thereof. Also enclosed, is the \$25.00 filing fee for this Petition.

If you have any questions regarding Respondents' Petition, or would like to discuss it further, please do not hesitate to contact me.

With highest regards I remain,

Very truly yours,

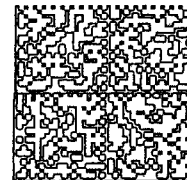


L. GRANT CLOSE III

LGC/mbh

cc: E. Charles Grose, Jr., Esquire
Robert J. Tinsley, Sr., Esquire
R. Jamison Tinsley, Jr., Esquire

WSACTIVE LLP:8588688.1



NEOPOST
FIRST-CLASS MAIL
\$001.78⁰
07/14/2016 ZIP 30363
042M14847569

US POSTAGE

RECEIVED
JUL 18 2016
SC Court of Appeals

 Ius Laboris USA Global HR Lawyers
FordHarrison
100 Dunbar Street
Suite 300
Spartanburg, South Carolina 29306

First Class Mail
First Class Mail

VIA UNITED STATES MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

