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THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED
JUL 14 2016
SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

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,

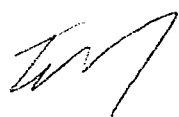
of whom

Rosemary Jenrette, a/k/a Rosemary Long Jenrette.....Petitioner,

Horry County State BankRespondent.

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

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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: 

William W. DesChamps, Jr.
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E-mail: wwd@deschampsllaw.com
William W. DesChamps, III
SC Bar No.: 77150
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1357 21st Avenue North, Suite 102
Myrtle Beach, South Carolina 29577
(843) 448-2391
Attorneys for Rosemary Jenrette

Myrtle Beach, South Carolina

July 12, 2016

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In The Supreme Court

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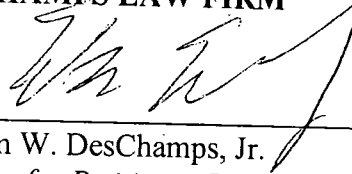
I certify that I have served one (1) copy of the Petitioner's Motion for Extension to file Reply to Respondent's Return of Petition for Writ of Certiorari upon counsel for Respondent Horry County State Bank by depositing a copy of the same in the United States Mail, postage prepaid, on July 12, 2016,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



William W. DesChamps, Jr.
Attorney for Petitioner Rosemary Jenrette
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Myrtle Beach, South Carolina 29577
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WILLIAM W. DESCHAMPS, JR., ESQ.#^

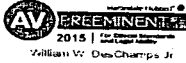
WILLIAM W. DESCHAMPS, III, ESQ.#

PEGGY G. DESCHAMPS, OFFICE ADMINISTRATOR

CERTIFIED CIRCUIT COURT MEDIATOR

^ CERTIFIED CIRCUIT COURT ARBITRATOR

*Martindale-Hubbell® Bar Register of Preeminent Lawyers™



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P.O. BOX 2402 (29578)

MYRTLE BEACH, SC 29577

TELEPHONE: (843) 448-2391

FACSIMILE: (843) 448-3308

July 12, 2016

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SC Court of Appeals

VIA NEXT DAY AIR DELIVERY

TRACKING NO.: 1Z F66 059 22 1001 585 7

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
Appellate Case No.: 2016-000915

Dear Mr. Shearouse:

Enclosed please find the original and six (6) copies of Petitioner's Motion for an Extension to file the Reply to Respondent's Return of Petition for Writ of Certiorari. 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.

By carbon copy, I have served a copy of this letter and Motion for an Extension of Time to file the Reply enclosed herewith on Respondent's counsel, Randall K. Mullins and Jarrod E. Ownbey, and forwarded same to the Clerk of Court of the South Carolina Court of Appeals.

Please feel free to contact me if you have any questions or need anything further.

Most Respectfully,

DESCHAMPS LAW FIRM

Kelsey A. Hemerick
Paralegal

WWDIII: kah

Enclosures as stated.

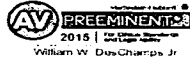
The Honorable Daniel E. Shearouse
Clerk of Court for the South Carolina Supreme Court
July 12, 2016
Page 2 of 2

CC: Randall J. Mullins, Esquire
Jarrod E. Ownbey, Esquire
The Honorable Jenny A. Kitchings, Clerk of Court – South Carolina Court of Appeals
Rosemary Jenrette, Client.

DESCHAMPS LAW FIRM*
ATTORNEYS-AT-LAW

www.deschampslaw.com

WILLIAM W. DESCHAMPS, JR., ESQ.#^
WILLIAM W. DESCHAMPS, III, ESQ.#
PEGGY G. DESCHAMPS, OFFICE ADMINISTRATOR
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SC Court of Appeals

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court for South Carolina Court of Appeals
1015 Sumter Street – 5th Floor
Columbia, SC 29201

RE: Rosemary Jenrette a/k/a Rosemary Long Jenrette v. Horry County State Bank
Appellate Case No.: 2016-000915

Dear Ms. Kitchings:

Enclosed please find one original and one copy of Petitioner's Motion for an Extension to file the Reply to Respondent's Return of Petition for Writ of Certiorari. Please file the original and return a clocked copy in the enclosed pre-paid self-addressed envelope.

By carbon copy, I have served a copy of this letter and copies of the Petitioner's Motion for an Extension to file the Reply to Respondent's Return of Petition for Writ Certiorari enclosed herewith on Respondent's counsel.

Please feel free to contact me if you have any questions or need anything further.

Most Respectfully,

DESCHAMPS LAW FIRM

Kelsey A. Hemerick
Paralegal

WWDIII: kah

Enclosures as stated.

CC: Randall K. Mullins, Esquire
Jarrod E. Ownbey, Esquire
Rosemary Jenrette, Client.

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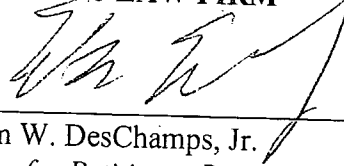
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Attorney for Petitioner Rosemary Jenrette
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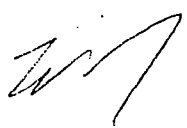
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