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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

RECEIVED
AUG 22 2016
SC Court of Appeals

Appellate Case No. 2016-000419
Trial Court Case No. 2013-CP-10-03251

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

MOTION FOR ADDITIONAL EXTENSION OF ONE (1) WEEK'S TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Counsel for Appellant
Winsor Custom Homes, LLC

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TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant Winsor Custom Homes, LLC, by and through its undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, hereby moves this Honorable Court to allow it until Monday, August 29, 2016, i.e., one (1) week from today, to file/serve its initial brief and designation of matter to be included in the record on appeal.

1. By order of July 28, 2016, the Court granted Appellant a second extension of its initial briefing/designation of matter deadline, establishing a deadline of today, Monday, August 22, 2016.

2. Appellant's counsel is certainly aware of the language 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. This is an appeal from a four-day jury trial and Appellant has a number of issues/arguments to present in its brief. Having recently missed a week in the office on account of a family summer vacation, the undersigned finds himself in need of additional time to prepare Appellant's initial brief and designation and humbly requests that the Court allow the modest dispensation requested herein under the circumstances.

4. Counsel respectfully submits the requested relief is consistent with the

interests of justice and will not work any undue prejudice upon Respondent.

5. Prior to making this motion, the undersigned consulted with Respondent's counsel Christy Ford Allen, Esquire, who has kindly authorized him to advise the Court that Respondent does not object to the Court's grant of the requested relief.

WHEREFORE, Appellant respectfully requests that this Honorable Court allow it through Monday, August 22, 2016, to file/serve its initial brief and designation of matter to be included in the record on appeal. Further, Appellant respectfully requests that the Court hold its present initial briefing/designation of matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: _____

Stephen L. Brown (SC Bar No. 66468)
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Counsel for Appellant
Winsor Custom Homes, LLC

Charleston, South Carolina

Dated: 8/22/16

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PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
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Counsel for Appellant
Winsor Custom Homes, LLC

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant Winsor Custom Homes, LLC, hereby certify that the **MOTION FOR ADDITIONAL EXTENSION OF ONE (1) WEEK'S TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent Rosemary Connelly on August 22, 2016, by depositing a copy of the same in the U.S. Mail, with sufficient postage, addressed as follows to her counsel of record:

Christy Ford Allen, Esquire
John A. Massalon, Esquire
Wills Massalon & Allen LLC
P.O. Box 859
Charleston, SC 29402
Counsel for Respondent
Rosemary Connelly

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: _____
Russell G. Hines (SC Bar No. 72100)
Counsel for Appellant
Winsor Custom Homes, LLC

Charleston, South Carolina

Dated: 8/22/16

YCRLAW
Young Clement Rivers, LLP
CELEBRATING 50 YEARS OF LEGAL SERVICE
50 YEARS

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

July 22, 2016

VIA FASCIMILE AND US MAIL
Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

Re: Rosemary Connelly v. Winsor Custom Homes, LLC
Appellate Case No.: 2016-000419
Case No.: 2013-CP-10-03251
Claim No.: CPP001009129
YCR File: 10857-20130494

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a Motion for Additional Extension of One (1) Week's Time to File/Serve Initial Brief of Appellant and the original and one (1) copy of the Proof of Service of same. Also enclosed is a firm check in the amount of $25.00 to cover the costs associated with this request.

Kindly file the original and return one court-stamped copy of each document to me using the pre-stamped envelope provided. Thank you for your assistance with this matter.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

Enclosures
(via US Mail and email)
Cc: Christy Ford Allen, Esquire Wills Massalon & Allen, LLC
John A. Massalon, Esquire, Wills Massalon & Allen, LLC

YCRLAW
Young Clement Rivers, LLP

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To: 18037341839
From: kbarnes@ycrlaw.com
Date: August 22, 02:45:13 PM EDT
Subj: Connelly v. Winsor; Case No.: 2016-000419
Pages: 8

RECEIVED
AUG 22 2016
Court of Appeals

Dear Ms. Kitchings,

Attached please find correspondence in the above-referenced matter. The original and all copies, along with the corresponding check have been placed in the mail. Please do not hesitate to let me know if you have any questions or concerns.

Thank you!

Katy B. Barnes
Commercial Litigation Secretary
Stephen L. Brown, Russell G. Hines & Joanna B. Stroud
Young Clement Rivers, L.L.P.
25 Calhoun Street, Suite 400
Charleston, SC 29401
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