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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SEP 29 2016

SC Court of Appeals

Appeal from Charleston County
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Judge

Appellate Case No.: 2016-000419

Rosemary Connelly,

Respondent,

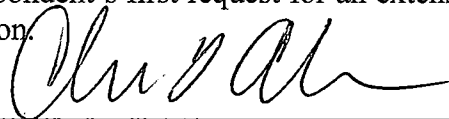
v.

Winsor Custom Homes, LLC,

Appellant.

RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

NOW COMES counsel for Respondent, and moves this Honorable Court to grant an extension of time of thirty (30) days beyond the thirty (30) days as made applicable by Rules 208 and 209 of the South Carolina Appellate Court Rules to file her Initial Brief and Designation of Matter to be Included in the Record on Appeal with the Clerk of Appellate Court. Counsel submits as justification for this request that this is Respondent's first request for an extension of time, and counsel for Appellant consents to this extension.



Christy Ford Allen (SC Bar #15649)
John A. Massalon (SC Bar #10279)
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ATTORNEYS FOR RESPONDENT

CHARLESTON, SOUTH CAROLINA

September 26, 2016

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Judge

Appellate Case No.: 2016-000419

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SC Court of Appeals

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal by depositing a copy of it in the United States Mail, postage prepaid, on September 26, 2016 addressed to:

Stephen L. Brown, Esquire (SC Bar #66468)
Russell G. Hines, Esquire (SC Bar #72100)
Young Clement Rivers, LLP
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September 26, 2016

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The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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SC Court of Appeals

RE: Rosemary Connelly v. Winsor Custom Homes, LLC
Appellate Case No.: 2016-000419
Our File No.: 1088-1

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal, along with Proof of Service in regard to the above-referenced matter. In addition, please find Wills Massalon & Allen LLC's check in the amount of \$25.00 representing the filing fee. Please return one (1) file-stamped copy to me in the self-addressed, stamped envelope provided.

By copy of this correspondence, I am serving the same upon all counsel of record. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



Christy Ford Allen
callen@wmalawfirm.net

CFA/cb
Enclosures

cc: Ms. Rosemary Connelly (c/o Mr. William Connelly)
Stephen L. Brown, Esquire
Russell G. Hines, Esquire

J



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SC Court of Appeals

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