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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

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SC Court of Appeals

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

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

**APPELLANT'S SECOND MOTION
FOR EXTENSION OF TIME TO FILE/SERVE
INITIAL REPLY BRIEF AND DESIGNATION OF MATTER**

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

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

COMES NOW Appellant Winsor Custom Homes, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of ten (10) days' additional time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal.

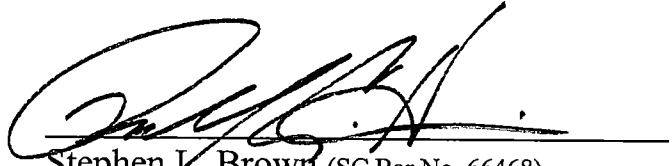
Presently, by order of this Court filed November 9, 2016, the deadline for Appellant's initial reply brief and designation of matter is today, November 17, 2016. On account of work-related and other time commitments of counsel, Appellant respectfully requests that this deadline be extended by 10 days (from November 17, 2016), i.e., through November 28, 2016. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 10 days' time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving the initial reply brief and designation of matter would be November 28, 2016, according to the undersigned's calculations. Further, Appellant respectfully requests that the Court hold its present initial-reply-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)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

(843) 720-5488

Attorneys for Appellant

Winsor Custom Homes, LLC

Charleston, South Carolina

Dated:

11/17/16

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PROOF OF SERVICE

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Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellant
Winsor Custom Homes, LLC

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served **APPELLANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF AND DESIGNATION OF MATTER** on the above-named Respondent by depositing a copy of the same in the United States Mail, postage prepaid, on November 17, 2016, addressed as follows to Respondent's counsel:

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

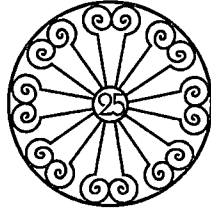
YOUNG CLEMENT RIVERS, LLP

By:


Russell G. Hines
Attorneys for Appellant
Winsor Custom Homes, LLC

Charleston, South Carolina

Dated: 11/17/16



YCR LAW
Young Clement Rivers, LLP

Kathleen B. Barnes
Secretary

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

November 17, 2016

VIA US MAIL AND FASCIMILE

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

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

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Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of **Appellant's Second Motion for Extension of Time to File/Serve Initial Reply Brief and Designation of Matter** and one (1) copy of the **Proof of Service** of same. Also enclosed is our firm's 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

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

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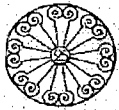
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Charleston, SC 29402-0993

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Jenny Abbott Kitchings, Clerk of
Court
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