

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Stephanie P. McDonald, Circuit Court Judge

Appellate Case No. 2014-000824
Case No. 2011-CP-10-7166

Otha Delaney,

Appellant,

v.

First Financial of Charleston, Inc.,

Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE/SERVE RETURN TO PETITION FOR REHEARING**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
Perry M. Buckner, IV (SC Bar No. 100031)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
ATTORNEYS FOR RESPONDENT

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SC COURT OF APPEALS

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

COMES NOW Respondent First Financial of Charleston, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of seven (7) days' additional time to file/serve its Return to Petition for Rehearing.

Presently, by order of this Court filed December 6, 2016, the deadline for Respondent's Return to Petition for Rehearing is December 8, 2016. On account of work-related and other time commitments, Respondent respectfully requests that this deadline be extended 7 days, i.e., through December 15, 2016. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondent moves this Honorable Court to grant it an additional extension of 7 days' time to file/serve its Return to Petition for Rehearing. With the extension requested herein, the new deadline for filing/serving its Return to Petition for Rehearing would be December 15, 2016, according to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold its present Return to Petition for Rehearing deadline in abeyance until it acts upon this motion.

[Signature on next page]

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

Russell G. Hines (SC Bar No. 72100)

Perry M. Buckner, IV (SC Bar No. 100031)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

ATTORNEYS FOR RESPONDENT

Charleston, South Carolina

Dated: 12/8/16

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PROOF OF SERVICE

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Russell G. Hines (SC Bar No. 72100)
Perry M. Buckner, IV (SC Bar No. 100031)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
ATTORNEYS FOR RESPONDENT

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondent above named, do hereby certify that I have served **Motion for Extension of Time to File/Serve Return to Petition for Rehearing** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on December 8, 2016, addressed as follows to Appellant's counsel of record:

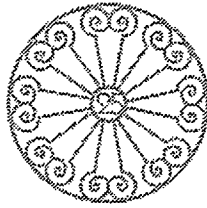
Philip L. Fairbanks, Esquire
Philip Fairbanks, P.C.
1214 King Street
Beaufort, SC 29902
Attorneys for Appellant

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines (SC Bar No. 72100)
ATTORNEYS FOR RESPONDENT

Charleston, South Carolina

Dated: 12/8/16



YCR LAW

Kathleen B. Barnes
Secretary

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

December 8, 2016

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SC Court of Appeals

VIA FACSIMILE AND US MAIL

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

Re: Otha Delaney v. First Financial of Charleston
Appellate Case No.: 2014-000824
Case No.: 2011-CP-10-7166
YCR File: 14768-20110934

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven (7) copies of a Motion for Extension of Time to File/Serve Return to Petition for Rehearing and the original and two (2) copies of a Proof of Service regarding the same. Also enclosed is our firm's check in the amount of \$25.00 to cover the cost of filing this motion.

Kindly return one (1) stamped copy to us in the envelope provided. With best wishes and kindest regards, I am

Sincerely,

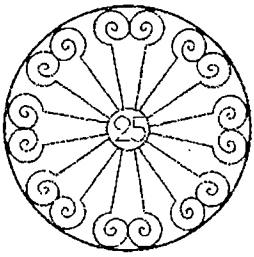
YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

Enclosures

(via US Mail and email)

cc: Philip L. Fairbanks, Esquire (via U.S. Mail and email)



YCR LAW

Young Clement Rivers, LLP

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To: 18037341839
From: kbarnes@ycrlaw.com
Date: December 08, 03:36:45 PM EST
Subj: Delaney v. First Financial; Case No.: 2014-000824
Pages: 8

Dear Ms. Kitchings,

Attached please find correspondence in the above-referenced matter. The original, all necessary copies and our filing fee has been placed in the mail. Please do not hesitate to let us know if you need anything further.

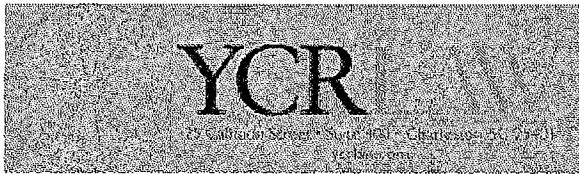
Thank you!

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