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

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Appeal from Charleston County  
Court of Common Pleas

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

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

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**RECEIVED**

DEC 29 2016

SC Court of Appeals

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

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**MOTION FOR EXTENSION OF TIME  
TO SERVE RECORD ON APPEAL**

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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*

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, on the grounds stated below, hereby moves this Honorable Court for an extension of fifteen (15) days' time to serve the record on appeal in this matter.

1. Appellant served (and filed) its initial reply brief on November 28, 2016; consequently, the deadline for Appellant to serve the record on appeal is December 28, 2016, the thirtieth (30<sup>th</sup>) day after service of its initial reply brief. Rule 210(a), SCACR ("Within thirty (30) days after service of the last brief, the appellant shall serve a copy of the Record on Appeal on each party who has served a brief."); *see also* Rule 263(a), SCACR (regarding computation of time).

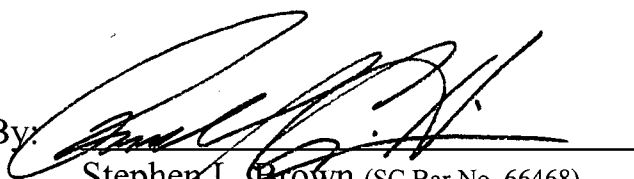
2. On account of other time commitments, both work- and non-work-related, including especially those associated with the present holiday season, the undersigned requests an extension of fifteen (15) days' time to prepare and serve the record on appeal and submits that this request is founded upon good cause, is consistent with the interests of justice, and will not work any undue prejudice upon Respondent Rosemary Connelly.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant it an extension of fifteen (15) days' time, running from the present December 28, 2016, deadline, i.e., an extension through Thursday, January 12, 2017, to

prepare and serve the record on appeal in this matter. Further, Appellant respectfully requests that the Court hold in abeyance Appellant's present deadline for serving the record on appeal until the Court acts on the instant 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

Charleston, South Carolina 29401

P.O. Box 993 (29402)

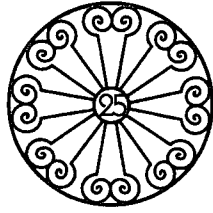
(843) 720-5488

*Counsel for Appellant*

*Winsor Custom Homes, LLC*

Charleston, South Carolina

Dated: 12/27/16



# YCR LAW

Tiffany L. Bates  
Legal Secretary

**RECEIVED**  
Direct Dial: (843) 721-5488  
Direct Fax: (843) 579-2929  
E-mail: [tbates@ycrlaw.com](mailto:tbates@ycrlaw.com)  
DEC 29 2016

December 27, 2016

**SC Court of Appeals**

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  
YCR File: 10857-20130494

Dear Ms. Kitchings:

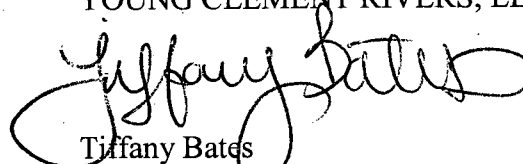
Enclosed herewith for filing in the above-referenced matter, please find the original and seven (7) copies of **Appellant's Motion for Extension of Time to File Record on Appeal** and one (1) copy of the **Proof of Service** of same. Also enclosed is our firm's check in the amount of \$25.00 to cover 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



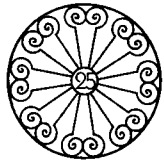
Tiffany Bates  
Legal Secretary

TLB/  
Enclosures  
cc (w/enc., via email and U.S. Mail):

John A. Massalon, Esquire  
Christy Ford Allen, Esquire

J

# FIRST CLASS MAIL



**YCRLAW**  
Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400  
P.O. Box 993  
CHARLESTON, SC 29402

TLB  
10857-20130494

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