

**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

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

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JAN 12 2017

SC Court of Appeals

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

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

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.

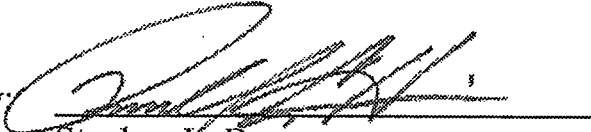
Presently, by order of this Court filed January 4, 2017, the deadline for filing the Record on Appeal is January 12, 2017. On account of work-related and other time commitments, the undersigned requests an extension of fifteen (15) days' time (from January 12, 2017), i.e., through January 27, 2017, to 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 January 12, 2017, deadline, i.e., an extension through Friday, January 27, 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.

[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)

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: 1/12/19

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PROOF OF SERVICE

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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*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant Winsor Custom Homes, LLC, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO SERVE RECORD ON APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on January 12, 2017, properly posted for delivery to the following addressees:

Christy Ford Allen, Esquire
John A. Massalon, Esquire
Wills Massalon & Allen LLC
P.O. Box 859
Charleston, SC 29402

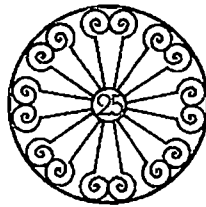
Counsel for Respondent
Rosemary Connelly

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: 1/12/17



YCR LAW

Kathleen B. Barnes
Secretary

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

January 12, 2017

VIA FACSIMILE AND US MAIL

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

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JAN 12 2017

SC Court of Appeals

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 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 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

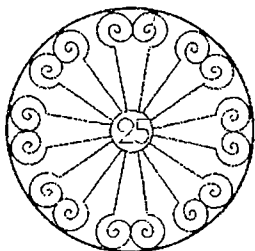
Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

Enclosures

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



YCR LAW

Young Clement Rivers, LLP

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To: 18037341839
From: kbarnes@ycrlaw.com
Date: January 12, 12:40:04 PM EST
Subj: Connelly v. Winsor; Case No.: 2016-000419
Pages: 8

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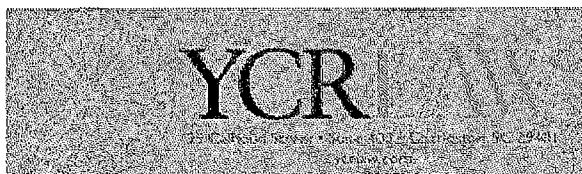
SC Court of Appeals

Dear Ms. Kitchings,

Attached please find correspondence in the above-referenced matter regarding our request for extension on the Record on Appeal. Hard copies along with the filing fee have been placed in the mail. Please do not hesitate to let me 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.
25 Calhoun Street, Suite 400
Charleston, SC 29401
Telephone: (843) 724-6610
Facsimile: (843) 579-1369



Charleston Office
25 Calhoun Street, Suite 400 * Charleston, SC 29401
P.O. Box 993 * Charleston, SC 29402-0993

TELEPHONE: (843) 577-4000
WEBSITE: www.ycrlaw.com

Young Clement Rivers, LLP
<http://www.ycrlaw.com>
Charleston: (843) 577-4000

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