

82946

**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

Case No. 2012-CP-10-5429

**RECEIVED**

APR 03 2017

SC Court of Appeals

Sara Y. Wilson,

Appellant,

v.

Charleston County School District,

Respondent,

**RESPONDENT'S CONSENT MOTION  
FOR EXTENSION OF TIME TO PETITION FOR REHEARING**

YOUNG CLEMENT RIVERS LLP  
Stephen L. Brown  
Catherine H. Chase  
Leslie M. Whitten  
25 Calhoun Street, Suite 400  
P. O. Box 993  
Charleston, SC 29402-0993  
Telephone: (843) 577-4000  
Facsimile: (843) 579-2983  
E-Mail: sbrown@ycrlaw.com  
cchase@ycrlaw.com  
lwhitten@ycrlaw.com  
*Attorneys for the Respondent  
Charleston County School District*

COMES NOW Respondent Charleston County School District, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and, on the grounds set forth below, hereby moves this Honorable Court for an extension of fifteen (15) days' time to petition for rehearing of this matter, which the Court decided by opinion filed Wednesday, March 22, 2017. *Wilson v. Charleston County Sch. Dist.*, Op. No. 5475 (Shearouse Adv. Sh. No. 12 at 13).

1. Rule 221(a), SCACR, provides, "Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court." Based on the March 22<sup>nd</sup> filing of the Court's opinion in this case, the present deadline for Respondent to petition for rehearing is the close of business Thursday, April 6, 2017, i.e., the 15<sup>th</sup> day after the filing of the opinion, as computed under Rule 263(a), SCACR.

2. On account of other time commitments, both work- and non-work-related, including over a week of depositions and a three-day mediation, the undersigned requests an extension of fifteen (15) days' time for Respondent to petition for rehearing.

3. The undersigned submits that, under the circumstances, there exists good cause for the Court to grant the relief requested herein, such

relief constituting a reasonable dispensation, timely sought and consistent with the interests of justice, posing no threat of undue prejudice to any other party.

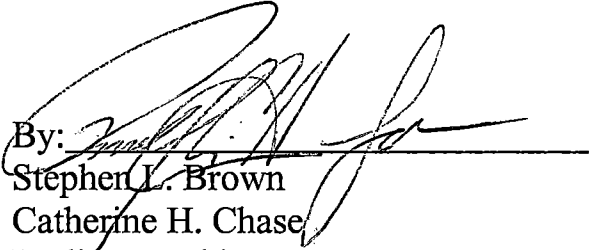
*4. Before submitting this motion, counsel for Respondent consulted with Appellant's counsel, Blake A. Hewitt, Esquire, who has kindly authorized the undersigned to represent to the Court that he consents and has no objection to this request. (A copy of the undersigned's email correspondence with Mr. Hewitt regarding this matter is attached hereto as Exhibit 1.)*

WHEREFORE, Respondent requests that the Court grant it an extension of 15 days' time (from Thursday, April 6, 2017) to petition for rehearing; by the undersigned's calculations, if this request is granted, the new deadline for the Court's actual receipt of Respondent's petition for rehearing would be Friday, April 21, 2017. ADDITIONALLY, Respondent requests that the Court hold this matter in abeyance (and not send down the remittitur) while the present motion is pending.

*[signature on following page]*

Respectfully submitted,

YOUNG CLEMENT RIVERS LLP

By:   
Stephen L. Brown  
Catherine H. Chase  
Leslie M. Whitten  
25 Calhoun Street, Suite 400  
P. O. Box 993  
Charleston, SC 29402-0993  
Telephone: (843) 577-4000  
Facsimile: (843) 579-2983  
E-Mail: sbrown@ycrlaw.com  
cchase@ycrlaw.com  
lwhitten@ycrlaw.com

*Attorneys for the Respondent  
Charleston County School District*

Charleston, South Carolina

Dated: 3/31/14

**Bates, Tiffany**

---

**From:** Blake Hewitt <bhewitt@bntdlaw.com>  
**Sent:** Thursday, March 30, 2017 6:56 PM  
**To:** Chase, Catherine  
**Cc:** Bates, Tiffany  
**Subject:** Re: Sara Wilson v CCSD appeal

Good evening Catherine.

I appreciate that you always do me the courtesy of asking but I expect you know I have absolutely no objection and you are welcome to note my consent in the motion. I hope all is well with you and I wish you the best of luck in your mediation. All the very best, Blake.

Sent from my iPhone

On Mar 30, 2017, at 6:20 PM, Chase, Catherine <[CChase@ycrlaw.com](mailto:CChase@ycrlaw.com)> wrote:

Blake,

I hope all is well with you. Congratulations on your win this matter. I write though because I need to ask if you will not object to me filing a motion for extension of time to file a petition for rehearing in this matter. I have a three-day mediation next week, and the preparations for it have exceeded my expectations. I would like the additional time to address all necessary issues. If you do not object, may I note the same in my motion?

Thank you in advance,  
Catherine

Catherine Holland Chase, Esq.  
Young Clement Rivers, LLP  
phone: (843) 720-5488  
fax: (843) 579-2983  
email: [cchase@ycrlaw.com](mailto:cchase@ycrlaw.com)  
<image002.png>



**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

---

Case No. 2012-CP-10-5429

---

Sara Y. Wilson,

Appellant,

v.

Charleston County School District,

Respondent,

---

**PROOF OF SERVICE**

---

**RECEIVED**

APR 03 2017

**SC Court of Appeals**

YOUNG CLEMENT RIVERS LLP

Stephen L. Brown

Catherine H. Chase

Leslie M. Whitten

25 Calhoun Street, Suite 400

P. O. Box 993

Charleston, SC 29402-0993

Telephone: (843) 577-4000

Facsimile: (843) 579-2983

E-Mail: sbrown@ycrlaw.com

cchase@ycrlaw.com

lwhitten@ycrlaw.com

*Attorneys for the Respondent*

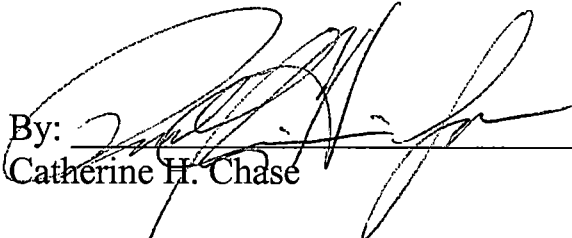
*Charleston County School District*

I, Catherine H. Chase, of Young Clement Rivers, LLP, counsel for the Respondent above named, do hereby certify that I have served the **Respondent's Consent Motion for Extension of Time to Petition for Rehearing** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on March 31, 2017, addressed as follows to their counsel of record:

Tiffany R. Spann-Wilder, Esquire  
The Spann-Wilder Law Firm, L.L.C.  
P. O. Box 70488  
N. Charleston, SC 29415

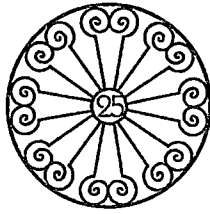
Blake A. Hewitt, Esquire  
Bluestein Nichols Thompson Delgado, LLC  
P. O. Box 7965  
Columbia, SC 29202

YOUNG CLEMENT RIVERS, LLP

By:   
Catherine H. Chase

Charleston, South Carolina

Dated: 3/31/17



# YCR LAW

Catherine H. Chase

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-2983  
E-mail: [cchase@ycrlaw.com](mailto:cchase@ycrlaw.com)

March 31, 2017

**VIA FEDERAL EXPRESS**

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

Re: Sara Y. Wilson v. Charleston County School District  
Appellate Case No. 2014-002596  
Case No.: 2014-002596  
YCR File: 6959-20062070

**RECEIVED**

APR 03 2017

**SC Court of Appeals**

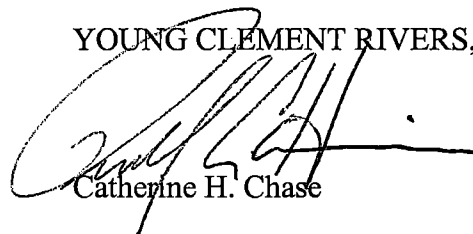
Dear Ms. Kitchings:

Enclosed for service upon you, please find the original and seven (7) copies of Respondent's Motion for Extension of Time to Petition for Rehearing, the original and one (1) copy of a Proof of Service, and this firm's check in the amount of \$25.00 for filing fees. Please file these documents and return one file-stamped copy of each to me in the envelope provide.

As always, thank you for your assistance. If you have any questions, please do not hesitate to contact me. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Catherine H. Chase

CHC/tlb

Enclosures

cc (w/enc., via email and U.S. Mail): Tiffany R. Spann-Wilder, Esquire  
Blake A. Hewitt, Esquire

rt  
carbon-neutral  
pe shipping

Alien top of FedEx Express® shipping label here.

ORIGIN ID:CHSA (843) 577-4000  
YOUNG CLEMENT RIVERS LLP  
25 CALHOUN ST  
CHARLESTON, SC 29401  
UNITED STATES US

SHIP DATE: 31MAR17  
ACTWGT: 0.59 LB  
CAD: 108928221/MSX12900

BILL SENDER

TO JENNY ABBOT KITCHINGS  
SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE STREET **RECEIVED**

COLUMBIA SC 29201

APR 03 2017

(803) 734-1890  
INV:  
PO:

REF:

DEPT:

Court of Appeals



FedEx  
Express



546J3/1RDB/531

J171117021401uu

MON - 03 APR 10:30A  
PRIORITY OVERNIGHT

TRK# 7860 9824 1731  
0201

SA USCA

29201  
SC-US CAE



RT 104  
FZ B20  
1 10:30  
E 1731  
04.03