

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

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Appeal from Dorchester County  
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

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Unpublished Opinion No. 2017-UP-067 (S.C. Ct. App. filed Feb. 1, 2017)

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William McFarland and Jennifer McFarland,                      Petitioners,

v.

Mansour Rashtchian and Amy Rashtchian,                      Respondents.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE PETITION FOR WRIT OF CERTIORARI**

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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 Petitioners*

Other Counsel of Record:

CLAWSON AND STAUBES, LLC  
David C. Cleveland  
Michael L. Leech  
126 Seven Farms Drive, Suite 200  
Charleston, South Carolina 29492  
(843) 577-2026

*Counsel for Respondents*

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JUN 23 2017

SC Court of Appeals



NOW COME Petitioners, William McFarland and Jennifer McFarland, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby move for an extension of ten (10) days' time to file/serve their petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

1. The Court of Appeals denied rehearing on May 24, 2017, making the deadline to file/serve a petition for writ of certiorari today, June 23, 2017, pursuant to Rule 242(c), SCACR.

2. Due to other time commitments, both work- and non-work-related (including time away from work for a recent family vacation), the undersigned counsel for Petitioners requests (10) additional days beyond today's date to finish preparation of Petitioners' petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari and submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioners respectfully request that this Honorable Court

allow them ten (10) days from today, i.e., 10 days from June 23, 2017, to file/serve their petition for writ of certiorari (and the appendix), i.e., to extend the deadline through Monday, July 3, 2017. Additionally, Petitioners respectfully request that the Court hold their present 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

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

*Counsel for Petitioners*

Charleston, South Carolina

Dated: 6/23/17

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**PROOF OF SERVICE**

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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 Petitioners*

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SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioners, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE PETITION FOR A WRIT OF CERTIORARI** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on June 23, 2017, properly posted for delivery to the following addressees:

David C. Cleveland, Esquire  
Michael L. Leech, Esquire  
Clawson & Staubes, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492-7595

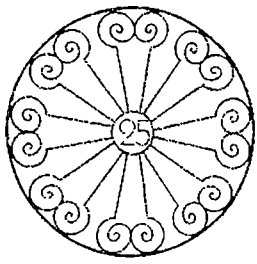
*Counsel for Respondents*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)  
*Counsel for Petitioners*

Charleston, South Carolina

Dated: 6/23/17



# YCR LAW

Young Clement Rivers, LLP

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**THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY**

To: 18037341839  
From: kbarnes@ycrlaw.com  
Date: June 23, 02:31:43 PM EDT  
Subj: McFarland v. Rashtchian; Case No.: 2015-000058  
Pages: 8

Dear Mr. Shearouse,

Attached please find correspondence in the above-referenced matter with regard to an extension request for a Petition for Writ of Certiorari. The originals along with all copies and our firm's \$25.00 is being placed in the mail today. Please do not hesitate to let us know if you have any questions or concerns.

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

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SC Court of Appeals



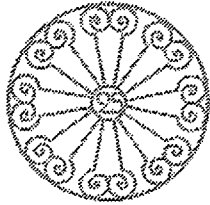
Charleston Office  
25 Calhoun Street, Suite 400 \* Charleston, SC 29401  
P.O. Box 993 \* Charleston, SC 29402-0993

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

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YCR LAW

Russell G. Hines  
Partner

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

June 23, 2017

**VIA U.S. MAIL & FACSIMILE**

South Carolina Supreme Court  
Honorable Daniel E. Shearouse, Clerk  
P. O. Box 11330  
Columbia, SC 29211-1330

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SC Court of Appeals

Re: McFarland v. Rashtchian  
Appellate Case No.: 2015-000058 (Court of Appeals)  
Case No.: 2013-CP-18-00735  
YCR File: 15508-20150131

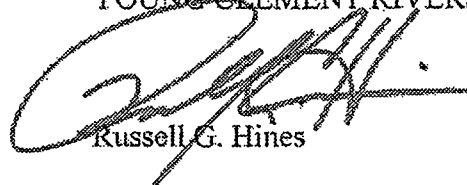
Dear Mr. Shearouse:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of Petitioners' **Motion for Extension of Time to File/Serve Petition for Writ of Certiorari**, the original and one (1) copy of a **Proof of Service** regarding the same, and a \$25 check to cover the filing fee. Kindly accept the originals and required copies of the documents and return one court-stamped copy of each to me in the envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/amj  
Enclosures

cc: Jenny Abbott Kitchings, Clerk, South Carolina Court of Appeals (via U.S. Mail & fax)  
(All below via U.S. Mail and email)  
David C. Cleveland, Esquire  
Michael L. Leech, Esquire