

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

RECEIVED

JUN 27 2017

Appeal from Dorchester County
Court of Common Pleas

S.C. SUPREME COURT

Diane Schafer Goodstein, Circuit Court Judge

Unpublished Opinion No. 2017-UP-067 (S.C. Ct.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

William McFarland and Jennifer McFarland, Petitioners,

v.

Mansour Rashtchian and Amy Rashtchian, Respondents.

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

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

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

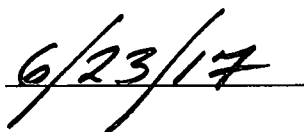
P.O. Box 993 (29402)

(843) 720-5488

Counsel for Petitioners

Charleston, South Carolina

Dated: _____



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PROOF OF SERVICE

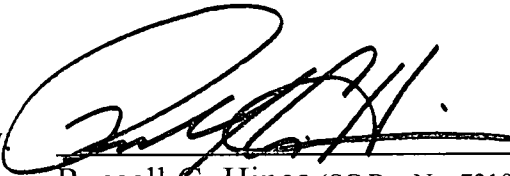
YOUNG CLEMENT RIVERS, LLP
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Russell G. Hines (SC Bar No. 72100)
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Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Counsel for Petitioners

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

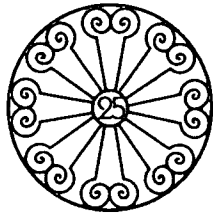
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)
Counsel for Petitioners

Charleston, South Carolina

Dated: 6/23/17



YCR LAW

Russell G. Hines
Partner

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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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JUN 27 2017

S.C. SUPREME COURT

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

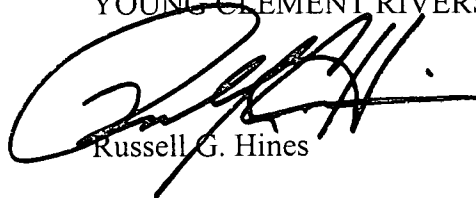
Dear Mr. Shearouse:

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



The Supreme Court of South Carolina

Russell Grainger Hines
PO Box 993
Charleston SC 29402-0993

06/27/2017

RECEIPT #83806

Case No:	2017-001404
Case Short Title:	William McFarland v. Mansour Rashtchian
Event:	Motion - Extension of Time (1st)
Fee Type:	Motion Fee
Amount:	\$25.00
Payment Type:	Check
Reference No:	177772
Check/Money Order Date:	06/23/2017
Comments:	