

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

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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Unpublished Opinion No. 2017-UP-067 (S.C. Ct.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.

**SECOND 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 five (5) additional 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 original deadline to file/serve a petition for writ of certiorari June 23, 2017, pursuant to Rule 242(c), SCACR.

2. By order filed June 27, 2017, this Court extended the deadline to today, July 3, 2017.

3. Due to other time commitments, both work- and non-work-related (including those associated with the Fourth of July holiday), the undersigned counsel for Petitioners requests five (5) 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 five (5) days from today, i.e., 5 days from July 3, 2017, to file/serve their petition for writ of certiorari (and the appendix), i.e., to extend the deadline through Tuesday, July 11, 2017.¹ 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)

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P.O. Box 993 (29402)

(843) 720-5488

Counsel for Petitioners

Charleston, South Carolina

Dated: 7/3/17

¹ See Rule 263(a) (regarding computation of time).

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PROOF OF SERVICE


YOUNG CLEMENT RIVERS, LLP
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Counsel for Petitioners

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioners, hereby certify that the foregoing **SECOND 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 July 3, 2017, properly posted for delivery to the following addressees:

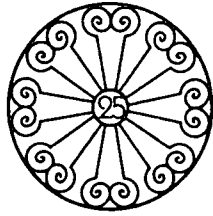
David C. Cleveland, Esquire
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Counsel for Respondents

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

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

Charleston, South Carolina

Dated: 7/3/17



YCR LAW

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July 3, 2017

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S.C. SUPREME COURT

VIA U.S. MAIL & FACSIMILE

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

Re: McFarland v. Rashtchian
Appellate Case No.: 2017-001404 (Supreme Court)
Appellate Case No.: 2015-000058 (Court of Appeals)
Case No.: 2013-CP-18-00735
YCR File: 15508-20150131

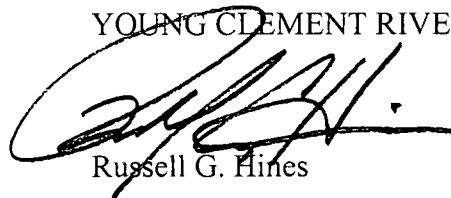
Dear Mr. Shearouse:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of Petitioners' **Second 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