

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

S.C. SUPREME COURT

J.C. Nicholson, Jr., Circuit Court Judge

Opinion No. 5475 (S.C. Ct. App. filed March 22, 2017)

Sara Y. Wilson,

Respondent,

v.

Charleston County School District,

Petitioner,

MOTION FOR EXTENSION OF TIME

YOUNG CLEMENT RIVERS LLP
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Attorneys for the Petitioner
Charleston County School District

COMES NOW Petitioner Charleston County School District, by and through its undersigned counsel, pursuant to Rules 240 and 242, SCACR, and, on the grounds set forth below, hereby moves this Honorable Court for an extension of ten (10) days' time to its Reply to the Return to Petition for Writ of Certiorari in this matter.

1. Because this matter is in the Supreme Court on a writ of certiorari, this request is governed by the Court's order *RE: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals*, S.C. Sup. Ct. Order dated July 16, 2001 (Shearouse Adv. Sh. No. 28 at 1).

2. On account of other time commitments, both work- and non-work-related, including various depositions being rescheduled because of Hurricane Irma, the undersigned requests an extension of ten (10) days' time for Petitioner to file its Reply to the Return to Petition for Writ of Certiorari.

3. Respondent's Return to Petition for Writ of Certiorari was served on September 12, 2017 via U.S. Mail and served electronically on September 13, 2017. As such, Petitioner's Reply is currently due on September 22, 2017. Petitioner has sought no extensions from the Court related to this writ of certiorari.

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, the undersigned counsel for Petitioner consulted with Respondent's counsel, Blake A. Hewitt, Esquire, who has kindly authorized the undersigned to represent to the Court that he 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, Petitioner requests that the Court grant it an extension of 10 days' time (from Friday, September 22, 2017) to file its Reply to the Return to Petition for Writ of Certiorari; by the undersigned's calculations, if this request is granted, the new deadline for the service of Petitioner Reply to the Return to Petition for Writ of Certiorari would be Monday, October 2, 2017. ADDITIONALLY, Petitioner requests that the Court hold this matter in abeyance while the present motion is pending.

Respectfully submitted,

YOUNG CLEMENT RIVERS LLP

By 

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Charleston County School District

Charleston, South Carolina

Dated: 

Chase, Catherine

From: Blake Hewitt <bhewitt@bntdlaw.com>
Sent: Wednesday, September 20, 2017 7:52 AM
To: Chase, Catherine
Subject: Re: Sara Wilson v Charleston County School District - Appeal

Of course I do not object and please so indicate.

We got way more wind than I expected but feel we dodged a bullet. The floods the last 2 years hit us hard. We really needed the break.

Sent from my iPhone

On Sep 20, 2017, at 7:38 AM, Chase, Catherine <CChase@ycrlaw.com> wrote:

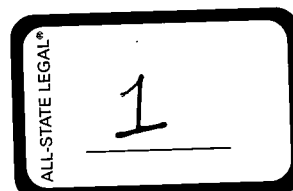
Blake,

I hope all is well with you and that you received little to no damage from Irma. My reply to your return is due Friday, September 22. Due to my calendar being shuffled around after Irma, I need an additional 10 days. Do you object? May I note that you do not object when I send my motion to the Supreme Court?

Thank you in advance,
Catherine

Catherine Holland Chase, Esq.
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<image003.png>

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PROOF OF SERVICE

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Attorneys for the Petitioner
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I, Catherine H. Chase, of Young Clement Rivers, LLP, counsel for the Petitioner above named, do hereby certify that I have served the *Motion for Extension of Time* submitted by the Petitioner on counsel for the above-named Respondent by depositing a copy of the same in the United States Mail, postage prepaid, on September 20, 2017, and via email, addressed as follows to her counsel of record:

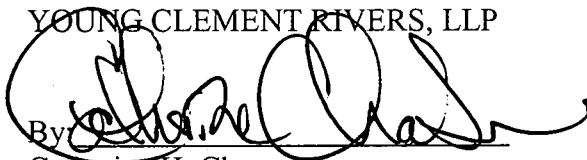
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YOUNG CLEMENT RIVERS, LLP

By 
Catherine H. Chase

Charleston, South Carolina

Dated: September 20, 2017