

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Marvin H. Dukes, III

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DEC 05 2017

SC Court of Appeals

Appellate Case No. 2015-001813
Lower Case No. 2014-CP-07-1732

Marilyn W. Bunn, a person *non compos mentis* by and through her guardian, Denise Suddes, and Margaret Bunn Lochmandy.....Respondents,

v.

Douglas S. Delaney, as Trustee and in his individual capacity, Alan Wilson, the South Carolina Attorney General, Sacred Heart-Griffin High School, St. Joseph's Home, Quincy University, Notre Dame, The Lawrenceville School, All Saints Catholic Church, and Habitat for Humanity c/o All Saints Catholic Church.....Defendants,

Of Whom Douglas S. Delaney is the.....Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE PETITION FOR REHEARING**

Pursuant to South Carolina Appellate Court Rule 263(b), Appellant hereby moves for an extension of fifteen (15) days from the existing deadline to file a petition for rehearing. The Appellant did not receive the this Court's decision, which was filed on November 22, 2017 – the day before Thanksgiving – until the following week, due to the Thanksgiving holiday. Therefore, Appellant requests an extension of fifteen (15) days to file any petition for rehearing on the grounds that he lacks sufficient time to prepare and file a petition before the current deadline, which requires

that the Court have the petition in hand by no later than December 7, 2017, or, three days from the date of this motion.

Appellant's petition for rehearing will be due on or before December 22, 2017 if the extension is granted.

Respectfully submitted,



Sean Michael Bolchoz
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Attorney for Appellant

December 4, 2017

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Of Whom Douglas S. Delaney is the.....Appellant.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to File Appellant's Petition for Rehearing upon the Respondents by depositing a copy of same in the United States Mail, postage prepaid, on December 4, 2017, addressed to Respondents' attorney of record, Robert E. Sumner, IV, Esquire.



Sean Michael Bolchoz
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Attorney for Appellant

December 4, 2017

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- petition for rehearing.wpd



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December 4, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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RE: Marilyn W. Bunn, et al. v. Douglas S. Delaney, et al.
Appellate Case No. 2015-001813

Dear Ms. Kitchings:

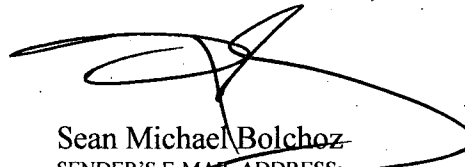
Please find enclosed the originals and one copy each of Appellant's Motion for Extension of Time to File Appellant's Petition for Rehearing and proof of service for the above-captioned case, along with this firm's check in the amount of \$25.00 for the filing fee. Please file the originals and return the clocked-copies to me via the enclosed self-addressed, stamped envelope.

By copy of this letter, we are serving counsel for the Respondents with copies of the aforesaid documents.

With kind, personal regards, I am

Sincerely,

BOLCHOZ LAW FIRM, PA



Sean Michael Bolchoz
SENDER'S E-MAIL ADDRESS:
SBOLCHOZ@BOLCHOZLAW.COM

SMB/kgb
Enclosures

cc: Robert E. Sumner, IV, Esquire (w/encl.)
Douglas S. Delaney, Esquire (via email only to doug@delaneylawfirm.com)

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South Carolina Court of Appeals
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