

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

**RECEIVED**  
FEB 26 2018  
SC Court of Appeals

Appeal from Charleston County  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2016-CP-10-4112

Jane Doe, an adult woman over the age of 18,

Respondent,

v.

TCSC, LLC, d/b/a Hendrick Toyota of North Charleston,

Appellant.

**SECOND MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL REPLY BRIEF**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Edward D. Buckley, Jr. (SC Bar No. 994)  
Nicholas J. Rivera (SC Bar No. 77186)  
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 Appellant*  
*TCSC, LLC, d/b/a Hendrick Toyota of*  
*North Charleston*

✓

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant TCSC, LLC, d/b/a Hendrick Toyota of North Charleston, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of an additional ten (10) days' time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed February 15, 2018, the deadline for Appellants' initial reply brief and corresponding designation of matter is today, February 22, 2018. On account of work-related and other time commitments, Appellant's counsel respectfully requests that this deadline be extended by an additional 10 days (from February 22, 2018), i.e., through March 5, 2018<sup>1</sup>. Respectfully, Appellant believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an extension of an additional 10 days' time to file/serve its initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial reply brief and designation of matter would be March 5, 2018, according to the

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<sup>1</sup> Calculating the 10-day period (from today, February 22, 2018) in accordance with Rule 263(a), SCACR, it runs until Monday, March 5, 2018, because the 10<sup>th</sup> day is Sunday, March 4, 2018.

undersigned's calculations. Further, Appellant respectfully requests that the Court hold its present initial-reply-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)  
Edward D. Buckley, Jr. (SC Bar No. 994)  
Nicholas J. Rivera (SC Bar No. 77186)  
Russell G. Hines (SC Bar No. 72100)  
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*Counsel for Appellant  
TCSC, LLC, d/b/a Hendrick Toyota of  
North Charleston*

Charleston, South Carolina

Dated: 2/22/18

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP

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*Counsel for Appellant*

*TCSC, LLC, d/b/a Hendrick Toyota of  
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I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on February 22, 2018, properly posted for delivery to the following addressees:

THE MASON LAW FIRM, P.A.  
Tidewatch Centre on Shem Creek  
Mark A. Mason, Esquire  
Anthony E. Forsberg, Esquire  
465 West Coleman Boulevard, Suite 302  
Mount Pleasant, South Carolina 29464

*Counsel for Respondent*  
*Jane Doe, an adult woman over the age of 18*

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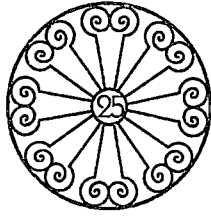
Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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

*Counsel for Appellant*  
*TCSC, LLC, d/b/a Hendrick Toyota of*  
*North Charleston*

Charleston, South Carolina

Dated: 2/22/18



# YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
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February 22, 2018

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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SC Court of Appeals

Re: Jane Doe vs. TCSC, LLC d/b/a Hendrick Toyota of North Charleston  
Appellate Case No. 2017-001216  
Case No.: 2016-CP-10-4112  
Claim No.: 30166435427-0001 / BHSI - LI609011506  
Date of Loss: 1/19/2016  
YCR File: 11176-20160726

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our Second Motion for Extension of Time to File/Serve Initial Reply Brief, the original and one (1) copy of the Proof of Service for same and our firm's check in the amount of \$25.00 to cover the filing fee.

Please file the originals and return court-stamped copies to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes  
Secretary

Enclosures

cc: Mark A. Mason, Esquire, The Mason Law Firm, P.A.  
Anthony E. Forsberg, Esquire, the Mason Law Firm, P.A.

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FIRST-CLASS MAIL

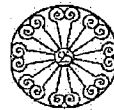
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