

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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DEC 27 2012

Appeal from Lancaster County  
Court of Common Pleas

S.C. Supreme Court

Brooks P. Goldsmith, Circuit Court Judge

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Opinion No. 5028 (S.C. Ct. App. Filed Aug. 29, 2012)

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Travis A. Roddey, as the Personal  
Representative of the Estate of  
Alice Monique Beckham Hancock,.....Appellant,

v.

Wal-Mart Stores East, LP, U.S. Security  
Associates, Inc., and Derrick L. Jones,.....Respondents.

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**RESPONDENTS' MOTION FOR EXTENSION OF  
TIME TO FILE RESPONDENTS' RETURN TO THE  
PETITION FOR A WRIT OF CERTIORARI**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the Respondents, Wal-Mart Stores East, LP, U.S. Security Associates, Inc., and Derrick L. Jones, herewith move the Court for an order granting them a thirty (30) day extension of time in which to file Respondents' Return to the Petition for a Writ of Certiorari. Respondents' Return to the Petition for a Writ of Certiorari is currently due on or before January 3, 2012. With a thirty (30) day extension of time, Respondents' Return to the Petition for a Writ of Certiorari would be due on or before February 4, 2013.

The extension requested herein is necessitated by multiple conflicts arising in other legal matters in which Respondents' counsel are involved, including the need for compliance with briefing deadlines in other litigated matters, as well as out-of-town travel and personal obligations in connection with the intervening holidays. This is the first extension requested by Respondents of this deadline. In light of the foregoing, Respondents, Wal-Mart Stores East, LP, U.S. Security Associates, Inc., and Derrick L. Jones, respectfully request a thirty (30) day extension of time until and including February 4, 2013, to have sufficient time to prepare and file a Return to the Petition for a Writ of Certiorari.

Finally, Respondents also respectfully request that this Court hold the briefing time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted,



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Attorneys for Respondents

December 21, 2012

Greenville, SC

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In the Supreme Court**

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the 21st day of December 2012, a copy of Respondents' Motion for Extension of Time to File Respondents' Return to the Petition for a Writ of Certiorari was placed in an envelope with sufficient postage prepaid, and mailed to counsel for Appellants as follows:

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# The Supreme Court of South Carolina

Stephanie G. Flynn  
PO Box 10589  
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12/27/2012

## RECEIPT #66672

**Case No:** 2012-213375  
**Case Short Title:** Travis Roddey v. Wal-Mart Stores  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 125744  
**Check/Money Order Date:** 12/21/2012  
**Comments:** Travis A. Roddey, PR Alice Beckham Hancock v. Wal-Mart Stores East