

THE STATE OF SOUTH CAROLINA

In The Supreme Court

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ON PETITION FOR WRIT OF CERTIORARI
TO THE COURT OF APPEALS,
WRIT GRANTED ON 08-02-18

S.C. SUPREME COURT

Appellate Case No. 2017-000743

Betty Fisher and Lisa Fisher,Petitioners

v.

Bessie Huckabee,Respondent

**MOTION TO AMEND
RESPONDENT'S BRIEF ON THE MERITS**

Respondent respectfully moves this Court for leave to amend her Brief on the Merits.

Respondent's motion is based on the following grounds:

1. By Order dated August 2, 2018, this Court set an expedited identical briefing schedule in the following cases:

- a. Appellate Case No. 2018-000662
- b. Appellate Case No. 2018-000566
- c. Appellate Case No. 2017-000743

2. The Court's Order further specifies that no extensions will be granted absent a showing of extraordinary circumstances.

3. Respondent's Brief on the Merits, Appellate Case No. 2017-000743 was due to be filed and served on September 11, 2018.

4. At or around 1:00 p.m. on Monday, September 10, 2018, Governor Henry McMaster declared a state of emergency and ordered a mandatory evacuation of coastal cities in South Carolina due to dangerous weather conditions related to hurricane Florence.

5. Attorney for the Respondent resides in Charleston, South Carolina, and was subject to the mandatory evacuation.

6. On the day before the due date for Respondent's Final Brief on the Merits, counsel for Respondent was interrupted in her drafting by the necessity to make preparations for the hurricane and evacuation.

7. Further, local post offices and government buildings in the Charleston area were to close on September 11th due to the hurricane and evacuation.

8. To ensure her brief was placed in the mail by the due date, counsel for Respondent was required to hastily mail the brief in an un-edited, un-finalized state.

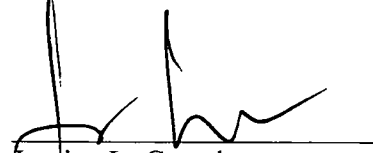
9. In light of the above, on September 10, 2018, prior to the filing deadline for Respondent's Final Brief on the Merits, counsel for Respondent, out of an abundance of caution, filed motion for extension of time to file.

10. Prior to hearing from the Court with regard to her motion for extension of time to file, counsel for Respondent, mailed her brief and served it on the Petitioners in this case.

WHEREFORE, the Respondent respectfully requests leave to amend her Brief on the Merits in Appellate Case No. 2017-000743.

Respectfully submitted,

The Crowley Law Firm, LLC

A handwritten signature in black ink, appearing to read 'Jessica L. Crowley', written over a horizontal line.

Jessica L. Crowley

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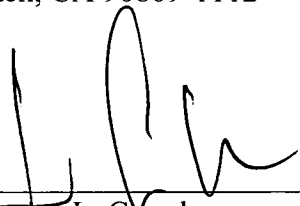
PROOF OF SERVICE

I certify that I have served a copy of Respondent's Motion to Amend Final Brief on the Merits in the above-referenced case upon the following parties by depositing a copy of it in the United States Mail, postage prepaid, on September 18, 2018 (and via electronic mail) addressed as follows:

LISA FISHER, *pro se*
P.O. Box 91112
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BETTY FISHER, *pro se*
P.O. Box 91112
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September 18, 2018



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