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

Appeal from Charleston County  
Court of Common Pleas

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

Appellate Case No. 2016-000419  
Circuit Court Case No. 2013-CP-10-03251

**RECEIVED**  
AUG 22 2019  
SC Court of Appeals

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

**MOTION FOR EXTENSION OF TIME TO PETITION  
FOR REHEARING ON BEHALF OF APPELLANT**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellant*

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

COMES NOW Appellant, Winsor Custom Homes, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of fifteen (15) days' additional time to file/serve a petition for rehearing of this matter, which the Court decided via opinion filed August 7, 2019. *See Connelly v. Winsor Custom Homes, LLC*, Unpublished Op. No. 2019-UP-287.).

1. Rule 221(a), SCACR, provides, "Petitions for rehearing must be actually received by the appellate court no later than fifteen (15) days after the filing of the opinion, order, judgment, or decree of the court."

2. Based on the August 7, 2019, filing of the Court's opinion in this case, the present deadline to petition for rehearing is the close of business Thursday, August 22, 2019, which, in accordance with Rule 263(a), SCACR (regarding computation of time), is the 15<sup>th</sup> day after the opinion's filing.

3. Because of work-related and other time commitments, the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

4. Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellant requests that the Court grant it an extension of 15 days' time (running from August 22, 2019) to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing Friday, September 6, 2019. ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Appellant requests that the Court hold the present deadline for petitioning for rehearing in abeyance until the Court acts on this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

(843) 720-5488

*Attorneys for Appellant*

Charleston, South Carolina

Dated: 8/21/19

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**PROOF OF SERVICE**  
\_\_\_\_\_

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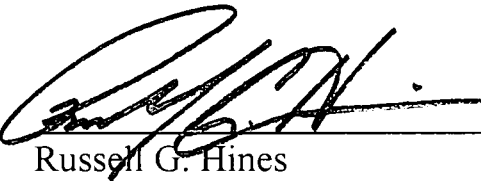
*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant above named, do hereby certify that I have served the **MOTION FOR EXTENSION OF TIME TO PETITION FOR REHEARING ON BEHALF OF APPELLANT** on the above-named Respondent by depositing a copy of the same in the United States Mail, postage prepaid, on August 21, 2019, addressed as follows to Respondent's counsel:

Christy Ford Allen, Esquire  
John A. Massalon, Esquire  
Wills Massalon & Allen, LLC  
P.O. Box 859  
Charleston, SC 29402  
*Attorneys for Respondent*  
*Rosemary Connelly*

YOUNG CLEMENT RIVERS, LLP

By:

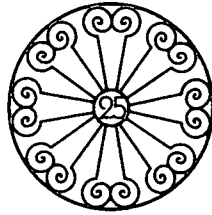


Russell G. Hines

*Attorneys for Appellant*

Charleston, South Carolina

Dated: 8/21/19



YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

August 21, 2019

**VIA FED EX OVERNIGHT AND FASCIMILE**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RECEIVED  
AUG 22 2019  
SC Court of Appeals

Re: Rosemary Connelly v. Winsor Custom Homes, LLC  
Appellate Case No.: 2016-000419  
Case No.: 2013-cp-10-03251  
Claim No.: CPP001009129  
YCR File: 10857-20130494

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of our Motion for Extension of Time to Petition for Rehearing on Behalf of Appellant, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$50.00. Please file the originals and return court stamped copies of each document to me in the enclosed envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes  
Secretary

Enclosure

cc: Christy Ford Allen, Esquire, Wills Massalon & Allen, LLC (via US Mail and email)  
John A. Massalon, Esquire, Wills Massalon & Allen, LLC (via US Mail and email)