

**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

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S.C. SUPREME COURT

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

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SC Court of Appeals

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.

1. Presently, by order of this Court filed August 27, 2019, the deadline to petition for rehearing is the close of business Friday, September 6, 2019.

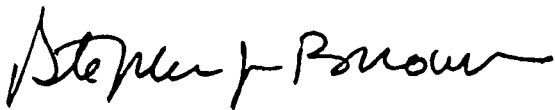
2. Because of work-related and other time commitments, as well as the approach of Hurricane Dorian (and the undersigned's office being near the Charleston harbor), the undersigned counsel for Appellant requests the Court's allowance of fifteen (15) days' additional time to petition for rehearing.

3. 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 September 6, 2019) to petition for rehearing. By the undersigned's calculations, the grant of this relief would make the new deadline to petition for rehearing Monday, September 23, 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: 9/3/2019

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PROOF OF SERVICE

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

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 September 3, 2019, addressed as follows to Respondent's counsel:

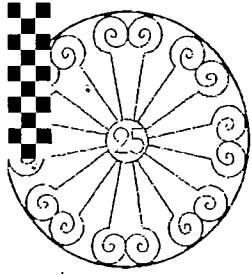
Christy Ford Allen, Esquire
John A. Massalon, Esquire
Wills Massalon & Allen, LLC
P.O. Box 859
Charleston, SC 29402
Attorneys for Respondent
Rosemary Connelly

YOUNG CLEMENT RIVERS, LLP

By: *Russell G. Hines by [Signature]*
Russell G. Hines
Attorneys for Appellant

Charleston, South Carolina

Dated: *9/3/2019*



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Young Clement Rivers, LLP

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To: 18037341499
From: kbarnes@ycrlaw.com
Date: September 03, 04:02:35 PM EDT
Subj: Connelly v. Winsor; Appellate Case No.: 2016-000419
Pages: 7

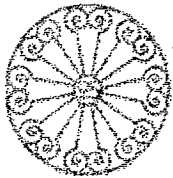
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Good afternoon,

Attached please find correspondence in the above-referenced matter. The original, all required copies and our firm's check for the filing fee will be sent via FedEx Overnight and should arrive to you tomorrow morning. Should you need anything further please do not hesitate to let us know.

Katy B. Barnes
Commercial Litigation Secretary to
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines
YCR LAW
25 Calhoun Street, Suite 400
Charleston, SC 29401
Phone: (843) 724-6610
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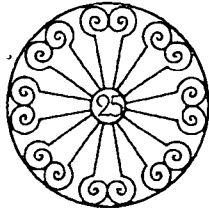
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Kathleen B. Barnes
Secretary

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September 3, 2019

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S.C. SUPREME COURT

VIA FED EX OVERNIGHT AND FASCIMILE

Honorable Daniel E. Shearouse, Clerk
South Carolina Supreme Court
P. O. Box 11330
Columbia, SC 29211-1330

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

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SC Court of Appeals

Dear Mr. Shearouse:

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 representing the filing fee. Please file the originals and return court-stamped copies of each to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

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)