

91016

RECEIVED

OCT 01 2019

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge
S. Jackson Kimball, Special Circuit Court Judge

Case No. 2016-002118

Lucille H. Ray, Appellant,

v.

City of Rock Hill, South Carolina, a Municipal Corporation, and South
Carolina Department of Transportation, an agency of the State of South
Carolina, Defendants,

Of which City of Rock Hill is the Respondent.

JOINT MOTION FOR EXTENSION OF TIME

The Parties hereby move the Court to extend the time to file and serve their returns to the respective Petitions for Rehearing by an additional ten (10) days. The Parties show the Court that the time for filing and serving their returns has not expired, as the Court requested returns be filed within ten days of its letter dated September 27, 2019. The Parties respectfully move the Court to extend the time to file and serve their returns to the respective Petitions for Rehearing until October 17, 2019, for the reason that the Parties need additional time to prepare their returns.

October 1, 2019

Richard B. Fennell / JRM

Richard B. Fennell
S.C. Bar No.: 10467
James, McElroy & Diehl, P.A.
Charlotte, NC 28202
(704) 372-9870
Attorney for Appellant

W. Mark White / JRM with permission

W. Mark White
Spencer & Spencer, P.A.
226 East Main Street
P.O. Box 790
Rock Hill, SC 29731
Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge
S. Jackson Kimball, Special Circuit Court Judge

Case No. 2016-002118

RECEIVED
OCT 01 2019
SC Court of Appeals

Lucille H. Ray, Appellant,

v.

City of Rock Hill, South Carolina, a Municipal Corporation, and South
Carolina Department of Transportation, an agency of the State of South
Carolina, Defendants,

Of which City of Rock Hill is the Respondent.

MEMORANDUM IN SUPPORT OF
JOINT MOTION FOR EXTENSION OF TIME

The Parties show the Court that the time to submit their returns to the respective Petitions for Rehearing has not yet expired, as the Court requested returns be filed within ten days of its letter date September 27, 2019. The Parties require additional time to prepare their returns. Pursuant to Rules 240 and 263(b), SCACR, the Parties respectfully move the Court to extend the time to file their returns by 10 days, up to and including October 17, 2019. The Parties each consent to the relief requested.

October 1, 2019

Richard B. Fennell
Richard B. Fennell
S.C. Bar No.: 10467
James, McElroy & Diehl, P.A.
Charlotte, NC 28202
(704) 372-9870
Attorney for Appellant

W. Mark White / *sent with permission*
W. Mark White
Spencer & Spencer, P.A.
226 East Main Street
P.O. Box 790
Rock Hill, SC 29731
Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge
S. Jackson Kimball, Special Circuit Court Judge

Case No. 2016-002118

RECEIVED

OCT 01 2019

SC Court of Appeals

Lucille H. Ray, Appellant,

v.

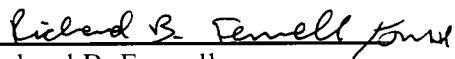
City of Rock Hill, South Carolina, a Municipal Corporation, and South
Carolina Department of Transportation, an agency of the State of South
Carolina, Defendants,

Of which City of Rock Hill is the Respondent.

PROOF OF SERVICE

I certify that I have served this Joint Motion for Extension of Time and Memorandum in
Support on the Respondent by depositing a copy of it in the United States Mail, postage prepaid,
on October 1, 2019, addressed to its attorneys of record, W. Mark White, Spencer & Spencer,
P.A., 226 East Main Street, Suite 200, Rock Hill, SC 29731.

October 1, 2019.


Richard B. Fennell
S.C. Bar No.: 10467
James, McElroy & Diehl, P.A.
Charlotte, NC 28202
(704) 372-9870
Attorney for Appellant

RECEIVED

OCT 01 2019

SC Court of Appeals

October 1, 2019

VIA HAND DELIVERY

South Carolina Court of Appeals
Clerk of Court
1220 Senate Street
Columbia, SC 29201

Re: Lucille Ray v. City of Rock Hill
Appellate Case No. 2016-002118

Dear Clerk:

Enclosed is an original and six copies of Motion for Extension of Time and our firm's check in the amount of \$50 representing the filing fee. Please file the Motion and return filed copies to me

Sincerely,



Sabrina Y. Williams
Paralegal to Richard B. Fennell

Enclosures

cc: Mark White