

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2019-001602
Case No. 2013-CP-10-3901

Charleston Electrical Services, Inc. and Selective Insurance
Company of South Carolina as Subrogee of
Charleston Electrical Services, Inc., Petitioners,

v.

Wanda G. Rahall..... Respondent.

MOTION TO FILE PETITIONERS' BRIEF OUT OF TIME

The Petitioners Charleston Electrical Services, Inc. and Selective Insurance Company of South Carolina as Subrogee of Charleston Electrical Services, Inc. respectfully move this Court to allow the filing of the Petitioners' Reply to Respondents' Return to Petition for Writ of Certiorari out of time.

The bases for this motion are as follows:

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1. The Court had previously granted an extension for the Petitioners to file their reply by December 5, 2019. That was a ten-day extension that was needed, in part, because the Respondent's counsel mailed his client's Return to an incorrect address -- the address that the undersigned counsel ceased using in January 2018. That delayed receipt of the return. The undersigned counsel fully anticipated getting this reply filed by the December 5, 2019 deadline, but he was then delayed because of another appellate brief that took longer than anticipated and because of delays resulting from a Federal Court mediation held on December 5, 2019, involving a FHA claim with the United States Department of Justice.

2. The Petitioners are thus asking for an additional five-day extension to allow for their reply to be accepted and filed. The Petitioners still had ten days worth of extensions available per this Court's Order dated July 16, 2014.

3. The Respondent will not be prejudiced by this additional extension. In fact, the Respondent received more than 20 days of extensions to file her return. In addition, her return was served on November 15, 2019, and the Court had granted an extension only through November 12, 2019. The Court thus accepted the Respondent's return out of time -- even without the benefit of a motion asking that the Court do so.

Respectfully submitted,

LINDEMANN, DAVIS & HUGHES, P.A.

BY:  _____

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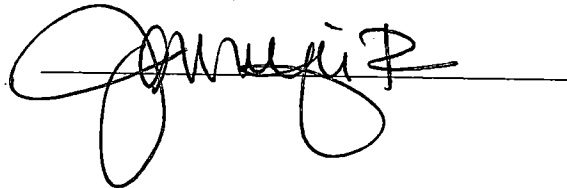
Counsel for Petitioners

December 10, 2019

CERTIFICATE OF SERVICE

The undersigned employee of Lindemann, Davis & Hughes, P.A., attorneys for the Petitioners, does hereby certify that service of the **Motion to File Petitioners' Brief Out of Time** was made upon all counsel of record by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 10th day of December 2019:

Edward K. Pritchard, III, Esquire
Pritchard Law Group, LLC
Post Office Box 630
Charleston, South Carolina 29402

A handwritten signature in black ink, appearing to read "Edward K. Pritchard, III", is written over a horizontal line. The signature is stylized and cursive.