

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

---

**RECEIVED**

DEC 16 2019

Appeal from Charleston County  
Court of Common Pleas

S.C. SUPREME COURT

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

---

Unpublished Opinion No. 2019-UP-287 (S.C. Ct. App. filed August 7, 2019)

---

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Petitioner.

---

**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE PETITION FOR A WRIT OF CERTIORARI  
TO THE COURT OF APPEALS**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioner*

NOW COMES Petitioner, Winsor Custom Homes, LLC, by and through its undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, hereby moves for an extension of ten (10) days' time to petition this Court for a writ of certiorari to review the Court of Appeals' decision in this matter.

1. The Court of Appeals denied rehearing on November 15, 2019, making the deadline to file/serve a petition for a writ of certiorari Monday, December 16, 2019, pursuant to Rule 242(c), SCACR.<sup>1</sup>

2. Due to other time commitments, both work- and non-work-related, the undersigned would greatly appreciate ten (10) additional days, beyond December 16, 2019, to prepare Petitioner's forthcoming petition for a writ of certiorari and humbly submits good cause exists to allow this dispensation: it being in furtherance of the interests of justice, not unduly prejudicial to Respondent, and consistent with the terms of the Court's aforementioned order of July 16, 2014.


WHEREFORE, Petitioner respectfully requests that this Honorable Court allow it ten (10) days beyond Monday, December 16, 2019, to file/serve its petition

---

<sup>1</sup> December 15, 2019, is a Sunday and thus excluded from the computation of time pursuant to Rule 263(a), SCACR.

for a writ of certiorari, i.e., to extend the deadline through Friday, December 27, 2019.<sup>2</sup> Additionally, Petitioner requests that the Court hold the present deadline in abeyance until it 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  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Counsel for Petitioner*

Charleston, South Carolina

Dated: 12/13/19

---

<sup>2</sup> Thursday, December 26, 2019, is a state holiday and thus excluded from the computation of time pursuant to Rule 263(a).

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

---

Appeal from Charleston County  
Court of Common Pleas

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

---

Unpublished Opinion No. 2019-UP-287 (S.C. Ct. App. filed August 7, 2019)

---

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Petitioner.

---

**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  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Counsel for Petitioner*


I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioner, Winsor Custom Homes, LLC, hereby certify that the foregoing **MOTION FOR EXTENSION OF TIME TO FILE/SERVE PETITION FOR A WRIT OF CERTIORARI TO THE COURT OF APPEALS** was served on Respondent, Rosemary Connelly, on December 13, 2019, by depositing a copy of the same in the U.S. Mail, with sufficient postage, addressed as follows to her counsel of record:

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

I further certify that I have filed said motion with the Court of Appeals, along with this Proof of Service, by depositing a copy of the same in the United States Mail, postage prepaid, on December 13, 2019, addressed as follows:

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)  
*Counsel for Petitioner*

Charleston, South Carolina

Dated: 12/13/19