

**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Unpublished Opinion No. 2019-UP-287 (S.C. Ct.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.

**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

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DEC 16 2019

SC Court of Appeals

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.¹

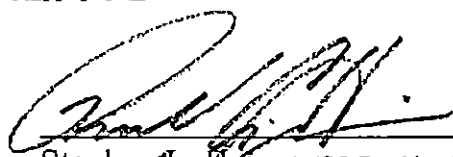
2. Due to other time commitments, both work- and non-work-related, the undersigned would greatly appreciate ten (10) additional days, beyond December 16, 2019, to prepare Petitioner's forthcoming petition for a writ of certiorari and humbly submits good cause exists to allow this dispensation: it being 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

¹ 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, 2019.² 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

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

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

Counsel for Petitioner

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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:

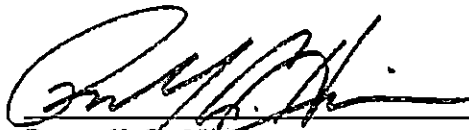
Christy Ford Allen, Esquire
John A. Massalon, Esquire
Wills Massalon & Allen LLC
P.O. Box 859
Charleston, SC 29402
Counsel for Respondent

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

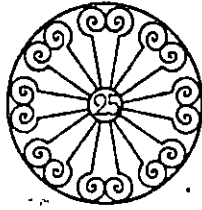
By: _____


Russell G. Hines (SC Bar No. 72100)

Counsel for Petitioner

Charleston, South Carolina

Dated: 12/13/19



YCR LAW

Kathleen B. Barnes
Secretary

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

December 13, 2019

VIA US MAIL 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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Dear Mr. Shearouse:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to File/Serve Petition for A Writ of Certiorari to the Court of Appeals, 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 original and return a court-stamped copy of each document to me in the enclosed envelope.

With best wishes and kindest regards, I am

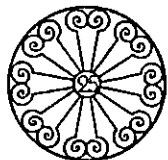
Sincerely,

YCR LAW, LLP

Kathleen B. Barnes
Secretary

Enclosures

Cc: (via US Mail and email)
Christy Ford Allen, Esquire, Wills Massalon & Allen LLC
John A. Massalon, Esquire, Wills Massalon & Allen LLC
(via US Mail and facsimile)
The Honorable Jenny Abbott Kitchings, Clerk of South Carolina Court of Appeals



YCR LAW

Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400
P.O. Box 993
CHARLESTON, SC 29402

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Jenny Abbott Kitchings, Clerk of Court
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