

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

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DEC 27 2019

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Unpublished Opinion No. 2019-UP-287 (S.C. Ct.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

**SECOND 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' additional 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. On December 13, 2019, Petitioner filed/served a motion asking for a 10-day extension of the deadline to petition for a writ of certiorari, i.e., an extension of the deadline through Friday, December 27, 2019.² This motion has not yet been ruled on.

3. Due to other time commitments, both work- and non-work-related, as well as the present holiday season, the undersigned would greatly appreciate ten (10) additional days, beyond December 27, 2019, to prepare Petitioner's forthcoming petition for a writ of certiorari and humbly submits good cause exists

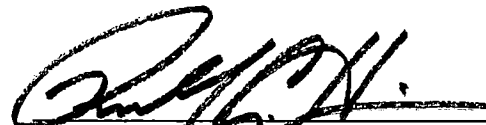
¹ December 15, 2019, was a Sunday and thus excluded from the computation of time pursuant to Rule 263(a), SCACR.

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 Friday, December 27, 2019, to file/serve its petition for a writ of certiorari, i.e., to extend the deadline through Monday, January 6, 2020. 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:



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Counsel for Petitioner

Charleston, South Carolina

Dated:

12/23/19

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² December 26, 2019, is a 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
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Counsel for Petitioner


I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioner, Winsor Custom Homes, LLC, hereby certify that the foregoing **SECOND 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 23, 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 23, 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: 12/23/19