

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

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Appeal from Charleston County  
Court of Common Pleas  
J.C. Nicholson, Jr., Circuit Court Judge

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**RECEIVED**

DEC 27 2019  
SC Court of Appeals

Unpublished Opinion No. 2019-UP-287 (S.C. Ct.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

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Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Petitioner.

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

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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.<sup>1</sup>

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.<sup>2</sup> 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

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<sup>1</sup> 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:



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: 12/23/19

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<sup>2</sup> 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**

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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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*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 **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

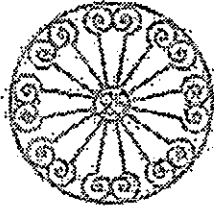
Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)

*Counsel for Petitioner*

Charleston, South Carolina

Dated: 12/23/19



# YCR LAW

Russell G. Hines  
Partner

Direct Dial: (843) 728-5488  
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December 23, 2019

**VIA U.S. MAIL AND FAX**

Honorable Daniel E. Shearouse, Clerk  
South Carolina Supreme Court  
P. O. Box 11330  
Columbia, SC 29211-1330

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DEC 27 2019

SC Court of Appeals

Re: Rosemary Connelly v. Winsor Custom Homes, LLC  
Appellate Case No.: 2019-002046 (Supreme Court)  
Appellate Case No.: 2016-000419 (Court of Appeals)  
Case No.: 2013-CP-10-03251  
Claim No.: CPP001009129  
YCR File: 10857-20130494

Dear Mr. Shearouse:

Enclosed please find the original and seven (7) copies of a **Second 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 for 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



Russell G. Hines

RGH/amj

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 fax)  
The Honorable Jenny Abbott Kitchings, Clerk of South Carolina Court of Appeals