

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

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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Unpublished Opinion No. 2019-UP-287 (S.C. Ct.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 LEAVE TO EXCEED PAGE LIMIT

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

Attorneys for Petitioner

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME COURT

COMES NOW the Petitioner, Winsor Custom Homes, LLC, by and through its undersigned counsel, pursuant to Rules 240 and 242, SCACR, and respectfully requests that this Honorable Court grant it permission to exceed the twenty-five page limit for its Petition for A Writ of Certiorari in the above-captioned matter.


This request, which is made contemporaneously with the submission of the Petition for A Writ of Certiorari, is made in good faith, and on the grounds that this appeal is from a four-day jury trial with a large record and a multitude of questions now presented to this Court. The undersigned believes that this is an appropriately modest extension, that it is consistent with the interests of justice, and that it will not be unduly prejudicial to the respondent.

WHEREFORE, Winsor Custom Homes, LLC respectfully moves this Court to grant it permission to exceed the page limitation imposed by Rule 242(d)(4), SCACR, and to accept for filing the Petition for A Writ of Certiorari submitted contemporaneously herewith.

[Signature on next page]

*[Signature page for Motion for Leave to Exceed Page Limit,
Appellate No. 2019-002046]*

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Petitioner

Charleston, South Carolina

Dated: Jan. 06, 2019 ^{2020 ALB}

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PROOF OF SERVICE

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I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioner above named, do hereby certify that I have served the **MOTION FOR LEAVE TO EXCEED PAGE LIMIT** on the above-named Respondent by depositing a copy of the same in the United States Mail, postage prepaid, on January 6, 2020, addressed as follows to Respondent's counsel:

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

YOUNG CLEMENT RIVERS, LLP

By: 
Stephen L. Brown
Attorneys for Petitioner

Charleston, South Carolina

Dated: Jan. 4, 2020