

**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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Case No. 2013-CP-10-03251

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Appellate Case No. 2019-002046  
On Writ of Certiorari to the Court of Appeals

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**RECEIVED**

**Sep 09 2020**

**S.C. SUPREME COURT**

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Petitioner.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE BRIEF OF PETITIONER**

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NOW COMES Petitioner, Winsor Custom Homes, LLC (“Winsor”), by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and, on the following grounds, moves this Honorable Court for an extension of the deadline to file/serve the Brief of Petitioner in this matter to Monday, September 14, 2020.

1. This matter is before the Court on writ of certiorari to the Court of Appeals.

2. The Court granted Winsor’s petition for a writ of certiorari by order filed August 10, 2020, making today, September 9, 2020, the deadline to file/serve the Brief of Petitioner, pursuant to Rule 242(i), SCACR.

3. As it happened, today’s deadline comes on the heels of the Labor Day holiday weekend, which also coincided with a family trip that took Winsor’s undersigned counsel out of town (and thus out of the office) from Friday, September 4<sup>th</sup>, to Monday, September 7<sup>th</sup>.

4. Though the undersigned attempted in good faith to complete the Brief of Petitioner by today’s deadline, he is in need of a small amount of additional time to do so and hopes the Court will deem the circumstances worthy of the relief requested herein, the undersigned humbly submitting that the grant of such relief is duly supported as an appropriately modest dispensation that is consistent with the interests of justice that will not result in any undue prejudice to Respondent or delay.

WHEREFORE, Winsor moves this Honorable Court to grant it an extension of

the present September 9, 2020, deadline to file/serve the Brief of Petitioner by three (3) business days, i.e., to extend the deadline to file/serve the Brief of Petitioner to Monday, September 14, 2020. Further, Winsor respectfully requests that the Court hold the present deadline to file/serve the Brief of Petitioner in abeyance until it acts on this motion.

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

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September 9, 2020