

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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Sep 10 2020

S.C. SUPREME COURT

Appeal from Charleston County  
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Judge

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Appellate Case No. 2019-002046

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Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

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Appellant.

RESPONDENT'S OBJECTION TO THE APPELLANT'S 12<sup>TH</sup> MOTION TO EXTEND TIME  
SINCE FILING A NOTICE OF APPEAL FROM THE JURY VERDICT ISSUED TO  
RESPONDENT ON FEBRUARY 28, 2015

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NOW COMES counsel for Respondent to lodge objection on behalf of Respondent Rosemary Connelly to the Appellant Winsor Custom Homes, LLC's 12<sup>th</sup> Motion to Extend Time under SCRAP, Rule 263 since the filing of its Notice of Appeal over 4 ½ years ago. A Charleston County jury issued a verdict in favor of Connelly for \$325,000 on August 28, 2015. Since that time, Appellant Winsor Custom Homes, LLC, a construction company represented by a law firm of over forty (40) lawyers, two (2) of whom are listed on this appeal (one of whom is chair of the firm's appellate group), has filed multiple motions to extend time at each and every stage of this very lengthy appeal. Respondent has filed one (1) motion to extend during the pendency of this appeal.

Respondent objects to the email submission of the 12<sup>th</sup> motion to extend time at 11:49pm

on September 9, 2020. No good cause is shown in the motion. Respondent requests the court deny the extension as excessive, dismiss this discretionary appeal, or take any curative measures this Honorable Court deems just.

s/Christy Ford Allen  
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ATTORNEYS FOR RESPONDENT

CHARLESTON, SOUTH CAROLINA

September 10, 2020