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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM SPARTANBURG COUNTY  
Grace Gilchrist Knie, Circuit Court Judge

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Opinion No. 2021-UP-252  
(S.C. Ct. App. filed July 7, 2021)

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Betty Jean Perkins,

Respondent,

v.

South Carolina Department of Transportation,

Petitioner.

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**RESPONDENT'S MOTION FOR EXTENTION  
TO FILE RETURN TO PETITION FOR WRIT OF CERTIORARI**

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The Respondent Betty Jean Perkins respectfully moves this Court for an extension to file and serve her Return to Petition for Writ of Certiorari.

The Respondent's motion is based on the following grounds:

1. That Petitioner served its Petition for Writ of Certiorari on Respondent on September 10, 2021.
2. The Respondent's Return to the Petition for Writ of Certiorari is due to be filed and served on or about October 10, 2021.
3. The undersigned counsel for the Respondent requires additional time to complete the Respondent's Return to the Petition for Writ of Certiorari because of other obligations and deadlines, including trial, mediations, and other unavoidable office matters.

4. Counsel for Respondent has attempted to consult with counsel for the Petitioner South Carolina Department of Transportation and has been unsuccessful.

WHEREFORE, the Respondent Betty Jean Perkins respectfully requests that she be granted a thirty (30) day extension to file and serve her Return to the Petition for Writ of Certiorari.

PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P. A.

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October 5, 2021