

RECEIVED

Oct 05 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM SPARTANBURG COUNTY
Grace Gilchrist Knie, Circuit Court Judge

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

Betty Jean Perkins,

Respondent,

v.

South Carolina Department of Transportation,

Petitioner.

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

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.

BY: 

John E. Parker (S.C. Bar #4442)
Neil E. Alger (S.C. Bar # 100530)
Post Office Box 457
Hampton, South Carolina 29924
(803) 943-2111
jparker@pmped.com
nalger@pmped.com

Counsel for Respondent.

October 5, 2021

RECEIVED

Oct 05 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM SPARTANBURG COUNTY
Grace Gilchrist Knie, Circuit Court Judge

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

Betty Jean Perkins,

Respondent,

v.

South Carolina Department of Transportation,

Petitioner.

CERTIFICATE OF SERVICE

The undersigned employee of Peters, Murdaugh, Parker, Eltzroth & Detrick, PA, counsel for the Respondent Betty Jean Perkins, does hereby certify that service of the **Respondent's Motion for Extension to File Return to Petition for Writ of Certiorari** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 5 day of October, 2021:

Andrew F. Lindemann, Esq.
Lindemann, Davis & Hughes, P.A.
Post Office Box 6923
Columbia, South Carolina 29260



PMIPED
PETERS | MURDAUGH | PARKER | ELTZROTH | DETRICK
ATTORNEYS AT LAW

RECEIVED
Oct 05 2021
SC Court of Appeals

October 4, 2021

Neil E. Alger
Direct Dial: (803) 914-6744
E-mail: nalger@pmped.com

Via Electronic Mail Only

The Honorable Patricia A. Howard
Clerk of Court
South Carolina Supreme Court
Email: suptcfilings@sccourts.org

Re: Betty Jean Perkins v. South Carolina Department of Transportation
SCCA Appellate Case Number: 2018-001665
Civil Action Number: 2016-CP-42-2478

Dear Ms. Howard:

Pursuant to Section (b)(1) of the Supreme Court's Order regarding Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (dated August 25, 2021), enclosed please find for filing the **Respondent's Motion for Extension to File Return to Petition for Writ of Certiorari** regarding the above-referenced matter.

By copy of this letter, I am hereby serving a copy of the Motion upon all counsel of record via email only pursuant to Section (d)(1) of the Supreme Court's Order regarding Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (dated August 25, 2021).

Please do not hesitate to contact me if you should have any questions.

With kind regards, I am

Sincerely,



Neil E. Alger

NEA/jlm
Enclosures

cc: (w/ enclosures)

Via Electronic Mail Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
ctappfilings@sccourts.org

Via Electronic Mail Only

Andrew F. Lindemann, Esq.
Lindemann, Davis & Hughes, P.A.
andrew@ldlawsc.com