

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

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**May 02 2022**

**S.C. SUPREME COURT**

Appeal from Horry County  
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

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Case No. 2015-CP-26-05573  
Appellate Case No. 2022-000498  
Unpublished Opinion No. 2021-UP-454, (S.C. Ct. App. filed Dec. 22, 2021)

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K.A. Diehl and Associates, Inc.,

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins,  
Mark Dos Santos, William Moore, Steven Dame  
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Petitioner.

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**MOTION FOR EXTENSION OF TIME  
TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI**

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CLEMENT RIVERS, LLP  
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*Attorneys for Petitioner*

NOW COMES Petitioner, Mark Dos Santos, by and through his undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby moves for a second extension of ten (10) days' time to file/serve his petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

Presently, by order of this Court dated April 22, 2022, the deadline for the petition for writ of certiorari is May 2, 2022. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioner requests ten (10) additional days, beyond today's date, to prepare Petitioner's petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned humbly submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioner respectfully requests that this Honorable Court grant him an extension of ten (10) days' time to file/serve his petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving his petition for writ of certiorari would be May 12, 2022, according to the

undersigned's calculations. Further, Petitioner respectfully requests that the Court hold his present deadline in abeyance until it acts upon this motion.

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*  
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May 2, 2022