

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

68040

Appeal from Charleston County
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2010-CP-10-7699

Jane Doe,

Appellant,

v.

Charles Smith, Charleston County School District
and James Island High School,

Respondents.

**SECOND MOTION FOR EXTENSION OF TIME
TO SERVE/FILE INITIAL BRIEF OF RESPONDENTS
CHARLESTON COUNTY SCHOOL DISTRICT AND
JAMES ISLAND HIGH SCHOOL**

RECEIVED

APR 15 2013

SC Court of Appeals

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown
Wilbur E. Johnson
Brian L. Quisenberry
Russell G. Hines
25 Calhoun Street, Suite 400 (29401)
P. O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
*Attorneys for Respondents
Charleston County School District
and James Island High School*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Respondents Charleston County School District and James Island High School (“Respondents”), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move this Honorable Court as follows for an additional extension of 30 days’ time to serve/file their initial respondents’ brief and corresponding designation of matter to be included in the record on appeal.

The Appellant, Jane Doe, served her initial brief on February 11, 2013. Based on this date of service, pursuant to Rule 208(a)(2), SCACR, the Respondents’ initial brief was originally due to be served/filed on or before March 13, 2013. In light of work-related and other time commitments, the Respondents previously asked for an extension, which the Court granted by Order filed March 15, 2013, extending the deadline through April 15, 2013.

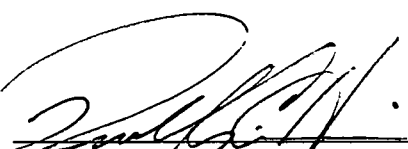
Again, on account of work-related and other time commitments (including the recent birth of the undersigned’s second child on March 25, 2013), the Respondents request an extension of 30 days additional time beyond April 15, 2013, i.e., through May 15, 2013, to serve/file their initial respondents’ brief and corresponding designation of matter to be included in the record on appeal. The Court’s allowance of the requested extension will be of considerable benefit to the Respondents’ counsel in preparing the

Respondents' initial brief/designation of matter and, counsel respectfully submit, it is in the interests of justice and will work no undue prejudice upon the Appellant or the other respondent to this appeal.

WHEREFORE, the Respondents move for an additional extension of time through May 15, 2013 to serve/file their initial respondents' brief and corresponding designation of matter to be included in the record on appeal. Further, the Respondents ask that their present briefing deadline be held in abeyance pending the Court's action on this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:  _____

Stephen L. Brown

Wilbur E. Johnson

Brian L. Quisenberry

Russell G. Hines

P.O. Box 993 (29402)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

(843) 720-5488

Attorneys for Respondents

Charleston County School District

and James Island High School

Charleston, South Carolina

Dated: 4/12/13

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

Appeal from Charleston County
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2010-CP-10-7699

Jane Doe,

Appellant,

v.

Charles Smith, Charleston County School District
and James Island High School,

Respondents.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown
Wilbur E. Johnson
Brian L. Quisenberry
Russell G. Hines
25 Calhoun Street, Suite 400 (29401)
P. O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
*Attorneys for Respondents
Charleston County School District
and James Island High School*

I, Russell G. Hines, of Young Clement Rivers, LLP, do hereby certify that a copy of the **Second Motion for Extension of Time to Serve/File Initial Brief of Respondents Charleston County School District and James Island High School** in the above-captioned matter was served on all parties hereto by depositing a copy of the same in the United States Mail, postage prepaid, on April 12, 2013, addressed as follows to their attorneys of record:

Aaron E. Edwards, Esquire
Alice Richter Lehrman, Esquire
Lawrence E. Richter, Jr., Esquire
The Richter Firm, LLC
622 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29464
Attorneys for the Appellant

-and-

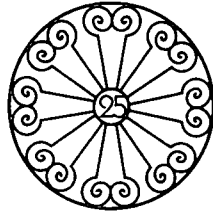
Robin L. Jackson, Esquire
Senn Legal, LLC
P.O. Box 12279
Charleston, SC 29422-2279
Attorneys for Respondent Charles Smith

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 4/12/13



YCR LAW
Young Clement Rivers, LLP

Jennifer L. Anderson
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: janderson@ycrlaw.com

April 12, 2013

VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Jane Doe v. Charles Smith, Charleston County School District and James Island High School
Appellate Number: 2013-000084
Case No.: 2010-CP-10-7699
Claim No.: 46138
Date of Loss: 9/1/1988
YCR File: 2235-20080353

Dear Ms. Kitchings:

Enclosed for filing in the above matter please find the original and seven (7) copies of a Second Motion for Extension, as well as our firm check in the amount of \$25.00 to cover the cost of filing this motion. Also enclosed are the original and two (2) copies of a Proof of Service concerning same.

Kindly return one (1) clocked copy of each document to us in the self-addressed, stamped envelope provided.

Thank you, in advance, for your assistance.

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Jennifer L. Anderson
Secretary

JLA/jla
Enclosures

cc: Robin L. Jackson, Esquire
Aaron E. Edwards, Esquire
Alice Richter Lehrman, Esquire
Lawrence E. Richter, Jr., Esquire

RECEIVED
APR 15 2013
SC Court of Appeals