

No. \_\_\_\_\_

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IN THE  
SUPREME COURT OF THE UNITED STATES

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J. Doe,

Petitioner,

v.

Design Review Board (DRB)  
of the  
Town of Sullivan's Island (TOSI),  
Alka Construction Co.,  
Svjetlana Bilic Damjanovic,  
Individually and d/b/a Alka  
Construction Co., Branko  
Damjanovic, Individually and  
d/b/a Alka Construction Co.,  
Kenneth Craft, III, Individually and  
d/b/a Craft Design Co.,

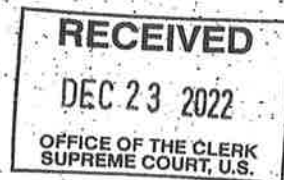
Respondents.

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SECOND AMENDED MOTION FOR EXTENSION OF TIME

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C. Holmes  
P.O. Box 187  
Sullivan's Isd.,  
SC 29482-0187  
(843)883-3010  
For Petitioner



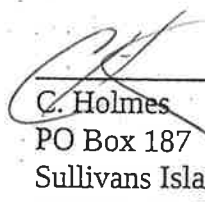
The petitioner respectfully makes this motion with abeyance request for enlargement of time to file cert petition to the state court of last resort. Please see attached copy of order of state court of last resort as well as correspondence refusing timely filed petition for rehearing dated 9.14.22 and 9.29.22. Matters of great public importance including but not limited to, conversion of unearned filing fees, are involved as well as, denial of substantial individual and property rights in conflict with authority by this Honorable Court and requiring extension of 60 days from date of resolution of this motion to comply with the Rules. Specifically, the reasons include but are not limited to, the holiday and interruptions caused by the ongoing and oncoming public health and affiliated economic emergencies. By analogy, there is broad discretion for this motion under Rule 6(b)(1), Fed. R. Civ. P. See *Lonestar Steakhouse & Saloon v. Alpha of Va., Inc.*, 43 F.3rd 922, 929 (4th Cir. 1995). “[A]n application under Rule 6(b)(1) normally will be granted in the absence of bad faith or prejudice to the adverse party.” *Mickalis Pawn Shop, LLC, v. Bloomberg*, 465 F.Supp.2d 543, 545 (D.S.C. 2006) (citations omitted). The petitioner respectfully submits there is no legal prejudice to the other side and the request is hereby entered in good faith.

For substantial justice affecting substantial rights, petitioner respectfully requests enlargement of time with abeyance of time limits pending resolution of this motion.

Dated 12/9/2022

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Respectfully submitted,

  
C. Holmes  
PO Box 187  
Sullivans Island, SC 29482  
843.883.3010

# The Supreme Court of South Carolina

J. Doe, Petitioner,

v.

Design Review Board (DRB) of the Town of Sullivan's Island (S.I.), Svjetlana Bilic Damjanovic, Individually and d/b/a Alka Construction Co., Branko Damjanovic, Individually and d/b/a Alka Construction Co., Kenneth Craft, III, Individually and d/b/a Craft Design Co., and Alka Construction Co., Respondents.

Appellate Case No. 2022-001123

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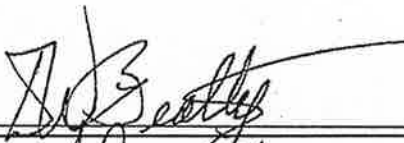
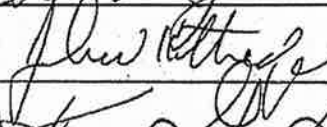
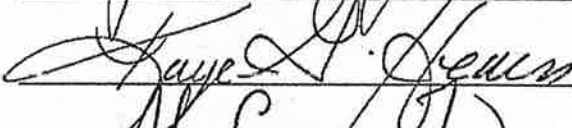
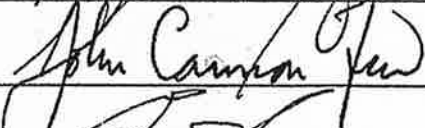

## ORDER

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Petitioner has filed a petition for a writ of certiorari to review the court of appeals' dismissal of her appeal on the ground the matter is moot. Petitioner has also filed a "motion for remand with abeyance."

We deny the petition for a writ of certiorari and the motion to remand with abeyance.

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|  | C.J. |
|  | J.   |
|  | J.   |
|  | J.   |
|  | J.   |

Columbia, South Carolina  
September 14, 2022

cc:

Benjamin Alexander Crute Traywick, Esquire

Alexandra Scott Williams, Esquire

John Phillips Linton, Jr., Esquire

George Trenholm Walker, Esquire

Cynthia Holmes

Kenneth Craft, III, Individually and d/b/a Craft Design Co., and Alka Construction  
Co.

The Honorable Jenny Abbott Kitchings

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# The Supreme Court of South Carolina

PATRICIA A. HOWARD  
CLERK OF COURT

BRENDA F. SHEALY  
CHIEF DEPUTY CLERK

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September 29, 2022

Ms. Cynthia Holmes  
Post Office Box 187  
Sullivans Island SC 29482

Re: J. Doe v. Design Review Board  
Appellate Case No. 2022-001123

Dear Ms. Holmes:

This acknowledges receipt of your petition for rehearing. Pursuant to Rule 221 of the South Carolina Appellate Court Rules (SCACR), "no petition for rehearing shall be allowed from an order denying a petition for a writ of certiorari under Rule 242, SCACR." Accordingly, no action will be taken on your petition for rehearing.

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Very truly yours,

*Patricia A. Howard*

CLERK

cc: Benjamin Alexander Crute Traywick, Esquire  
Alexandra Scott Williams, Esquire  
John Phillips Linton, Jr., Esquire  
George Trenholm Walker, Esquire  
Kenneth Craft, III, Individually and d/b/a Craft Design Co., and Alka  
Construction Co.

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