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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY COURT OF COMMON PLEAS
FOR THE ELEVENTH JUDICIAL CIRCUIT

Court Of Common Pleas

James O. Spence Circuit Court Judge

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JUL 29 2022

Case No.: 2016-CP-45-00590, Circuit Court
Appeals Court Docket No.: 2021-000849

SC Court of Appeals

Pleasant Spring Church, John N. Corley, Jr., Norma Mackie, And Chris Nellums, The Estate Of Ella Shuler, The Estate Of Mary E. Davis, The Estate Richard Corley, The Estate Willie Corley, The Estate Thomas Corley, The Estate Of Paul Corley, The Estate Of Mariah Addie, The Estate Of Andrew Corley, The Estate Of John N. Corley, And If Any Of The Individually Named Persons Are Deceased, Then Their Heirs Or devisees At Law, And Any And All Other Persons Unknown Claiming Any Right, Title, Estate, Interest In Or Lien Upon The Real Property Described Herein Designated As A Class As John Doe And Jane Doe,

Of Whom, Pleasant Spring Church, John N. Corley, Jr., and Norma Mackey..... Appellants,

v.

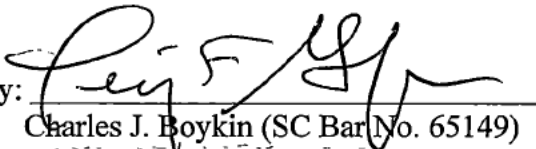
Pleasant Spring AME Church and African Methodist Episcopal Church, Inc.,..... Respondents.

RESPONDENTS' MOTION FOR EXTENSION OF TIME

The undersigned counsel for the Respondents hereby respectfully requests that this Court grant a 30 day extension of time in which to file Respondents' Initial Brief and Designation of Matter. The current deadline to file the Respondents' Initial Brief and Designation of Matter is August 1, 2022. The undersigned affirms that this Motion is not made for purposes of delay; rather, an increase in counsel's workload necessitates this request.

Therefore counsel for Respondents respectfully requests, for good and sufficient cause, that the time period for filing Respondents' Initial Brief and Designation of Matter in the above captioned matter be extended to August 31, 2022. Counsel for Respondents has consulted with counsel for Appellants concerning this extension, and has been advised that they have no objection.

July 26, 2022

By: 
Charles J. Boykin (SC Bar No. 65149)
Kenneth A. Davis (SC Bar No. 66416)
Tierney F. Goodwyn (SC Bar No. 102035)

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Attorneys for Respondents

Other Counsel of Record:

Adrienne L. Turner, Esq.
TURNER LAW, LLC
887 Pine Log Ford Road
Travelers Rest, South Carolina 29690

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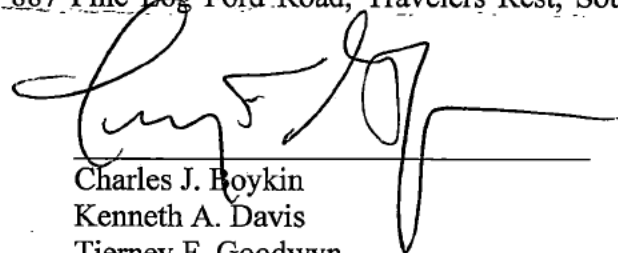
Of Whom, Pleasant Spring Church, John N. Corley, Jr., and Norma Mackey.....Appellants,

v.

Pleasant Spring AME Church and African Methodist Episcopal Church,Respondents.

PROOF OF SERVICE

I certify that I have served Respondents' Motion for Extension by electronic mail and depositing a copy of it in the United States Mail, postage prepaid, on July 26, 2022, addressed to their attorney of record, Adrienne L. Turner, 887 Pine Log Ford Road, Travelers Rest, South Carolina 29690.



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Attorneys for Respondents

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Tierney F. Goodwyn
tgoodwyn@boykinlawsc.com

July 26, 2022

VIA ELECTRONIC MAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

Re: Pleasant Spring AME Church, et al. v. Pleasant Spring Church, et al.
Appeals Court Docket No.: 2021-000849

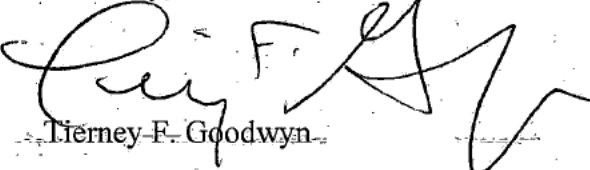
Dear Ms. Kitchings:

Enclosed for filing please find Respondents' Motion for Extension of Time to file Designation of Matter and Initial Brief submitted to the Court via electronic mail in the above-referenced matter. Also, enclosed please find the Proof of Service and filing fee.

By copy of this letter, we are serving all parties of record.

Thank you for your assistance in this matter.

Sincerely,


Tierney F. Goodwyn

/hhg

Enclosures

cc: Adrienne L. Turner, Esq.
Charles J. Boykin, Esq.
Kenneth A. Davis, Esq.

BOYKIN & DAVIS, LLC
Attorneys and Counselors at Law

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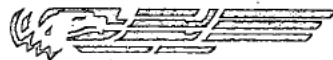
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