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THE STATE OF SOUTH CAROLINA
In the Court of Appeals
APPEAL FROM RICHLAND COUNTY
Amy McCulloch, Probate Judge

RECEIVED

AUG 05 2022

SC Court of Appeals

Case No. 2022-000959

In the Matter of the Estate of William Joseph, Jr./Clarence Goodwin, Jr., . . . Appellant,

vs.

Kim Mobley and Curtis Goodwin Respondent.

MOTION TO ALLOW LATE FILING

The undersigned attorney, Barbara E. Brunson, respectfully asks that this Court allow the attached Motion to be Relieved as Counsel be filed in response to the letter from the Clerk’s Office of the South Carolina Court of Appeals dated July 14, 2022. The referenced letter ask that I advise the Court of the status of my representation of the Appellant, Clarence Goodwin, Jr. by July 24, 2022 (Appellant).

Mr. Goodwin filed a Notice of Appeal from the Order to Repay the Estate of William Joseph, Jr., (Order) issued by the Richland County Probate Court on June 8, 2022. Upon receipt of the Order on June 8, 2022, I forwarded a copy of the order to Mr. Goodwin and asked that he contact me to discuss the Order. Mr. Goodwin never responded to my offer. On July 14, 2022, I received a letter from the Clerk’s Office advising me that Mr. Goodwin has filed a Notice of Appeal pro se.

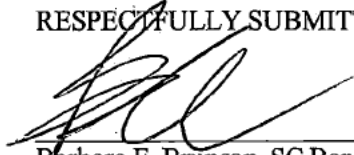
I met with Mr. Goodwin on July 26, 2022, and he advised me that he was dissatisfied with my services and was obtaining other counsel for the appeal. I advised Mr. Goodwin that we could file a consent order substituting counsel when he obtained counsel.

On August 1, 2022, I received an email from the Court with an attached filing wherein Mr. Goodwin advised this Court that I would no longer represent him. Upon receipt of a copy of this filing, I prepared this motion to allow a late filing of my motion to be relieved as counsel for Mr. Goodwin along with the proposed motion to be relieved as counsel.

Although we are outside of the ten-day time frame given in the Clerk of Court letter, Mr. Goodwin and I have agreed that he should obtain other counsel for this appeal. Unfortunately, Mr. Goodwin has apparently not been able to obtain counsel yet. Nevertheless, in the attached Motion to be Relieved as Counsel, I ask that this Court relieve me of representation of Mr. Goodwin.

I respectfully ask that this Court allow the late filing of the motion to be relieved as counsel for good cause shown herein.

RESPECTFULLY SUBMITTED



Barbara E. Brunson, SC Bar #0012940
Law Office of Barbara E. Brunson
3614 Landmark Dr., Ste B (29204)
P.O. Box 50943
Columbia, SC 29250

Date: August 3, 2022

THE STATE OF SOUTH CAROLINA
In the Court of Appeals
APPEAL FROM RICHLAND COUNTY
Amy McCulloch, Probate Judge

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PROOF OF SERVICE

I certify that I have served the Motion to Allow Late Filing and Motion to be Relieved as Counsel on the following parties by depositing a copy of it in the United States Mail, postage prepaid, on August 3, 2022.

Clarence Goodwin, Jr.
436 W. Lakeside Ave
Columbia, SC 29203

Barbara Preater
1825 Nunamaker Dr.
Columbia, SC 29210

Pamela Thomas
136 Habitat Circle
Decatur, GA 30034

Kim Mobley
517 Menlo Drive
Columbia, SC 20210

Curtis Goodwin
1715 Dupont Dr.
Columbia, SC 29223

Anthony Moore
3804 Total Eclipse St.
Las Vegas, NV 89129

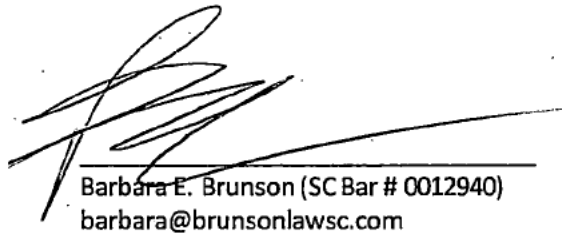
Nelson Isaiah Williams
1866 Lilac Lane, Apt. A1
Aurora, IL 60506

Jonathan Goodwin
1036 W. Loyola Ave., #31
Chicago, IL 60626

Joshua Goodwin
1036 W. Loyola Ave., #31
Chicago, IL 60626

Catrina Goodwin Murphy
367 Kimberwicke Dr.
Fayetteville, NC 28311

Antonio Goodwin
1441 Hunting Dr. #175
South Pasadena, CA 91030



Barbara E. Brunson (SC Bar # 0012940)
barbara@brunsonlawsc.com

Law Office of Barbara E. Brunson

August 3, 2022

Jenny Kitchings
Clerk of Court
The South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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AUG 05 2022
SC Court of Appeals

RE: In the Matter of the Estate of William Joseph, Jr.
Appellate Case No. 2022- 000959

Dear Ms. Kitchings:

Enclosed you will find an original and serve copies of a Motion to be Relieved as Counsel and a Motion to Accept the filing for the referred matter. I will appreciate your filing the original motions and returning a clocked-in copy to me in the enclosed self-addressed, stamped envelope.

Also enclosed is a check in the amount of \$100.00 for the motion filing fees.

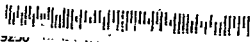
By copy of this letter, I am serving copies of this Motion.

Regards,


Barbara E. Brunson

Cc: Clarence Goodwin, Jr.
Kim Mobley
Curtis Goodwin
Antonio Goodwin
Pamela Thomas
Barbara Preater
Nelson Isaiah Williams
Jonathan Goodwin
Joshua Goodwin
Anthony Moore
Catrina Goodwin Murphy

Columbia, SC 29201



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SC Court of Appeals

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Clerk of Court
The South Carolina Court of Appeals
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