

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Sep 13 2022

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
HON. MARVIN H. DUKES
MASTER IN EQUITY

Appellate Case # 2022-00027

**GEORGIA HARRISON, BARBARA HARRISON,
JOYCE ELLEN HARRISON, WILLIAM S.
HARRISON, III, STANLEY ROBERTS AND
DIANA MENDHEIM INDIVIDUALLY AND AS
AGENT AND ATTORNEY IN FACT,**

Plaintiffs,

RESPONDENTS

vs.

**STEPHANIE LORRAINE KIRKLAND, GARY
LAMONT KIRKLAND, KIETA NICOLE WHITE,
AND CHERYL KIRKLAND,**

Defendants.

APPELLANTS

**MOTION FOR EXTENSION OF TIME TO FILE INTIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, appellant Stephanie Lorraine Kirkland, Gary Lamont Kirkland, Keita Nichole White and Cheryl Kirkland ("Appellant") move for an extension of time in which to serve and file appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal ("Designation of Matter"). Appellant requests an extension of twenty days to file the Initial Brief and Designation of Matter which are currently due September 16, 2022. This is the second request for an extension filed by Appellant.

The grounds for this motion are that other impending professional matters and obligations have created a need for additional time to prepare the Initial Brief and Designation of Matter, including matters pending before The Honorable Marvin H. Dukes, III, Beaufort County relating to Appellant's efforts to stay enforcement of judgment pending appeal as Appellant will be severely prejudiced if Respondents are permitted to consummate a sale of the property at issue while an appeal is pending before this Court challenging the validity of Respondent's ability to proceed with sale of the property at issue. The granting of an extension of time will not prejudice the rights of any of the parties.

We have notified counsel for Respondent of our intent to file this motion. Respondent objects to the relief sought in this motion. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than October 6, 2022.

For these reasons, Respondents requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter once the issue pertaining to the stay and supersedeas sought by the Appellants would have been ruled upon by the Master in Equity or upon ruling of this Court but no later than October 15, 2022.

Respectfully submitted,

THE HOUSTON LAW FIRM, LLC
1000 Main Street, Suite 200C
Hilton Head Island, South Carolina 29926
Telephone: 843-684-0211
Email: chouston@houstonlawfirm.net

By: S/ Charles E. Houston Jr.
Charles E. Houston Jr.
SC Bar # 2663
Attorney for Appellants

September 13, 2022
Hilton Head Island, SC

Hilton Head Islands, SC

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SC Court of Appeals

STATE OF SOUTH CAROLINA .
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, Master in Equity

Appellate Case No. 2022-000277

Georgia Harrison, Barbara Harrison, Joyce Ellen Harrison,
William S. Harrison III, Stanley Roberts, and Diana
Mendheim, individually and as agent and attorney in fact,

Respondents,

v.

Stephanie Lorraine Kirkland, Gary Lamont Kirkland,
Keita Nicole White and Cheryl Kirkland,

Appellants.

PROOF OF SERVICE

I certify that I have served the within MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF via email on the Court E-Filing system and also by depositing a copy of it in the United States Mail, postage prepaid, to all counsels of

record and addressed as follows:

Parties Served:

Thomas C. Taylor, Esq.
Law Office of Thomas C. Taylor, LLC
P.O. Box 5550
22 Bow Circle, Suite A
Hilton Head, SC 29928

And

Chester C. Williams, Esq.
Law Office of Chester C. Williams, LLC
17 Executive Park Road, Suite 2
PO Box 6028
Hilton Head Island, SC 29938-6028
Attorneys for Respondents

This 13th day of Septembert 2022 at Hilton Head Island, SC

The Houston Law Firm LLC
1000 Main Street, Suite 200C
Hilton Head Island, SC 29926
Phone:843-715-9078
chouston@houstonlawfirm.net

By: S/ Charles E. Houston Jr.
Charles E. Houston, Jr.
SC Bar # 2663



September 13 2022

Via U.S. Mail and Email (ctappfilings@sccourts.org)

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

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Sep 13 2022

SC Court of Appeals

**Re: Georgia Harrison v. Stephanie Kirkland
Appellate Case No.: 2022-000277**

Dear Ms. Kitchings:

I am submitting for filing in the above referenced case the following items:

- (1) Proof of Service
- (2) Proof/Affidavit of Service by e-mail and mailing
- (3) Motion for Extension of Time to File Appellant's Initial Brief
- (4) Check for \$50.00

Thank you in advance for your consideration of this request. If you have any questions, please do not hesitate to contact my office.

With kind regards, I am,

Respectfully,

The Houston Law Firm LLC

S/ Charles E. Houston Jr.

Charles E. Houston Jr.

Attorney for Appellant

SC Bar # 2663

cc: Via Email

Thomas Taylor, Esquire
Chester Williams, Esquire
Encls: as stated