

**RECEIVED**

**Dec 16 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ALLENDALE COUNTY  
Court of Common Pleas

The Honorable Lawton McIntosh

Appellate Case No. 2019-000905

J. Morgan Kears, Personal Representative of the Estate of G.H. Kears.....Appellant,

v.

The Kears Family Education Trust, William Gordon Kears, Elizabeth Kears Gooding, Julia Kears Sharp, Rachael Kears Best, Joseph Weber Kears, and John Morgan Kears, of which all are named individually and as Trustees of the Kears Family Education Trust U/A/D Nov. 05, 1992.....Respondents.

CONSENT MOTION FOR EXTENSION  
BY RESPONDENT JULIA KEARSE SHARP

Respondent Julia Kears Sharp moves this Court for a ten-day extension in which to file the Return to Appellant's petition for rehearing. This is Respondent's first request for an extension. Respondent's Return is currently due Monday, December 19, 2022. Respondent respectfully requests an extension of ten days, making the Return due on Thursday, December 29, 2022. Counsel for Appellant consented to this extension.

Respectfully submitted,

December 16, 2022

s/Daniel A. Speights  
Daniel A. Speights, SC Bar No. 5207  
SPEIGHTS & SOLOMONS, LLC  
Post Office Box 685  
100 Oak Street, East

Hampton, South Carolina 29924

*Attorney for Respondent Julia Kears Sharp*

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PROOF OF SERVICE

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The undersigned certifies that on December 16, 2022, a copy of Consent Motion for Extension by Respondent Julia Kears Sharp and Proof of Service has been served upon the counsel listed below by emailing a copy to the attorneys of record listed below. Pursuant to Supreme Court Order No. 2020-000447, subsection (g)(3), a copy of the email is attached. All *pro se* parties listed below are served by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below. All service is made to the parties in their individual capacities and as Trustees.

Kenneth B. Wingate  
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Post Office Box 521  
Allendale, SC 29810

Dated: December 16, 2022

Whitney B. Harrison  
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1517 Hampton Street  
Columbia, SC 29201

Joseph Weber Kears  
6620 Merrill Road  
Columbia, SC 29209

William Gordon Kears  
Post Office B ox 221  
Fairfax, SC 29827

By: s/Daniel A. Speights  
Daniel A. S peights, SC Bar No. 5708  
SPEIGHTS & SOLOMONS, LLC  
Post Office Box 685  
Hampton, SC 29924

**Subject:** J. Morgan Kears v. The Kears Family Education Trust (2019-000905)

**Date:** Friday, December 16, 2022 at 12:30:59 PM Eastern Standard Time

**From:** Susan Murdaugh

**To:** Court Of Appeals Filings

**CC:** kbw@swblaw.com, Kathleen Barnes, Matthew Myers, Steve Slotchiver, Whitney Harrison

**BCC:** Dan Speights

Attached for filing and electronic service to counsel, please find Respondent Julia Kears Sharp's Consent Motion for Extension to file the Return to Appellant's Petition for Rehearing. The motion filing fee is being sent in today's mail.

Thank you,

Susan T. Murdaugh

Paralegal to Daniel A. Speights, Attorney for

Respondent Julia Kears Sharp

Susan T. Murdaugh, Paralegal

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SC Court of Appeals

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December 16, 2022

**via E-Mail and U.S. Mail (to court and pro se parties only)**

V. Claire Allen  
Chief Deputy Clerk for the Court of Appeals  
[ctappfilings@sccourt.org](mailto:ctappfilings@sccourt.org)

Re: *J. Morgan Kears*e, *Personal Representative of the Estate of G.H. Kears*e v. *The Kears*e Family Education Trust, et. al.  
Appellate Case No. 2019-000905

Dear Ms. Allen:

Attached for filing is Consent Motion for Extension by Respondent Julia Kears

e Sharp to file the Return to Appellant's Petition for Rehearing and Proof of Service. By electronic copy of this letter, I am serving all counsel of record and *pro se* parties as stated below:

Pursuant to Order 2020-05-29-02, the \$50 filing fee is being mailed to the Court within five days of the date of this electronic filing.

With kind regards, I am

s/Daniel A. Speights

cc: Kenneth B. Wingate (via email only)  
Matthew J. Myers (via email only)  
Kathleen C. Barnes (via email only)  
Stephen M. Slotchiver, Esquire (via email only)  
Whitney B. Harrison (via email only)  
William Gordon Kears

e (via U.S. mail)  
Rachael Kearse Best (via U.S. mail)  
Joseph Weber Kearse (via U.S. mail)  
John Morgan Kearse (via U.S. mail)