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Jan 18 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity Charleston County

Case No. 2017-CP-10-5427
Appellate Case No. 2021-000793

Family Services, Inc., as Conservator for Muriel W. Clarkin.....Respondent,

v.

Patricia Clarkin Smith and Wells Fargo Bank, NA., Defendants,
Of whom Patricia Clarkin Smith is the Appellant.

NOTICE OF MOTION AND MOTION
FOR AN EXTENSION OF TIME TO
FILE THE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER OF RESPONDENT

Respondent, Family Services, Inc., as Conservator for Muriel W. Clarkin by and through its undersigned counsel, respectfully moves before this Court for an order granting Respondent a fifteen (15) day extension of time or until February 2, 2022, in which to file Respondent’s Initial Brief and Designation of Matter to be included in the Record of Appeal. The grounds for the motion are that Respondent's counsel has deadlines, mediations and noticed court appearances in other matters scheduled requiring counsels attention.

January 18, 2023.

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC
s/ D. Conor Keys
D. Conor Keys (100148)
P.O. Box 14225
Charleston, SC 29422
Phone: 843-906-3998
conor@dconorkeyslaw.com
Attorney for Respondent

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v.

Patricia Clarkin Smith and Wells Fargo Bank, NA., Defendants,
Of whom Patricia Clarkin Smith is the Appellant.

PROOF OF SERVICE

I certify that on this 18th day of January 2023, I have served the motion for extension upon Appellant by first class mail and electronic mail addressed as follows

Patricia Clarkin Smith
602 Atlantic St.
Mount Pleasant, SC 29464
smithpatriciaclarkin@gmail.com

THE LAW OFFICE OF
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January 18, 2023

Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org.

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**RE: Family Services, Inc., Conservator for Muriel W. Clarkin v. Patricia
Clarkin Smith
App. Case No. 2021-000793**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellant's Motion for Extension of Time to file Respondents Initial Brief and Designation of Matter;
- 2) Proof of Service for the Motion; and
- 3) Check for \$50.00 for the filing fee.

I kindly request that you file the same

With kind regards,

RESPECTUFLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC



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P.O. Box 14225
Charleston, SC 29422
Phone: 843-906-3998
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Attorney for Defendant

Enclosures:
(as stated)
CC:
Patricia Smith