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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

G. D. Morgan, Jr., Circuit Court Judge

Appellate Case No. 2022-001432

RECEIVED
JAN 17 2023
SC Court of Appeals

Michael Gene Putnam,.....Appellant,

v.

Robert Henry Purkerson,.....Respondent.

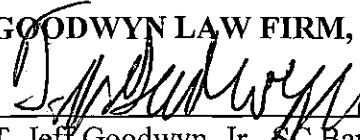
**MOTION FOR EXTENSION TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file his Initial Brief and Designation of Matter to be included in the Record on Appeal. Appellant filed its Notice of Appeal on October 11, 2022. Respondent filed a Motion to Dismiss on or about October 27, 2022. The Initial Brief and Designation of Matter would have been due on January 17, 2023 (January 14, 2023 was a Saturday, January 16, 2023, was a holiday); however, with Respondents Motion pending caused a stay on the filing deadline. The Order denying Respondent’s Motion to Dismiss was filed and served on the parties on January 5, 2023 through the Court. The Initial Brief of Appellant is currently due on February 8, 2023.

Due to Appellant’s counsel busy litigation schedule and based on the complexity of the issues on appeal that are involved in this case. Appellant hereby request a 30-day extension to file

their initial brief. If the extension is granted, the Initial Brief of Appellant will be due on March 10, 2023.

GOODWYN LAW FIRM, LLC



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Attorneys for Appellant

Columbia, South Carolina
January 17, 2023

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

G.D. Morgan, Jr., Circuit Court Judge

Case No. 2020-CP-23-01450
Appellant Case No.: 2022-001432

RECEIVED
JAN 17 2023
SC Court of Appeals

Michael Gene Putnam.....Appellant,

v.

Robert Henry Purkerson.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the **Motion for Extension to File Initial Brief and Designation of Matter** on Wesley J. Shull, Esquire, counsel for Respondent at the address below by depositing a copy of same in the United States Mail, postage prepaid, as well as via email as shown, on January 17, 202.

Wesley J. Shull, Esquire
Willson, Jones, Carter & Baxley
325 Rocky Slope Road, Suite 201
Greenville, SC 29607
wjshull@wjcblaw.com

(Signature on next page)

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Attorneys for Appellant

January 17, 2023

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** Of Counsel

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January 17, 2023

VIA HAND DELIVERY

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

RECEIVED
JAN 17 2023
SC Court of Appeals

RE: *Michael Gene Putnam v. Robert Henry Purkerson*
Case No.: 2020-CP-23-01450
Appellate Case No.: 2022-001432
Our File No.: 3000-0743

Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of a **Motion for Extension to File the Initial Brief and Designation of Matter** along with a Proof of Service in regards to the above referenced matter. Please have your office file the original and return a stamped copy to my office in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees for same.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Motion.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Wesley J. Shull, Esquire (Via Mail & Email)
Michael Putnam