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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

RECEIVED

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

MAR 06 2023

SC Court of Appeals

Appellate Case No. 2022-001432

Michael Gene Putnam,.....Appellant,

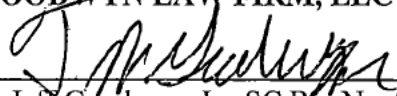
v.

Robert Henry Purkerson,.....Respondent.

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

Appellant hereby moves for an additional thirty (30) days in which to file its Initial Brief and Designation of Matter that is currently due March 10, 2023. If the extension is granted, the Initial Brief of Appellant will be due on April 10, 2023 (April 9, 2023 is a Sunday). This motion is based on the relative complexity of the issues on appeal that are involved in this case around an active trial schedule including multiple other appellate briefs being due in the next month.

GOODWYN LAW FIRM, LLC



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Attorneys for Appellant

Columbia, South Carolina
March 3, 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

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MAR 06 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 March 3, 2023.

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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March 3, 2023

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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

March 3, 2023

VIA HAND DELIVERY

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

RECEIVED
MAR 06 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

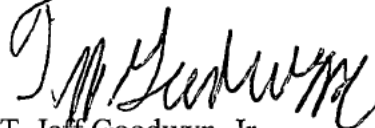
Dear Ms. Kitchings:

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