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MAR 20 2023

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
CIRCUIT COURT

DeAndrea G. Benjamin, Circuit Court Judge

Appellate Case No. 2022-001434

Emad Tadros, M.D.,.....Appellant,

v.

Holder Properties, Inc.,.....Respondent.

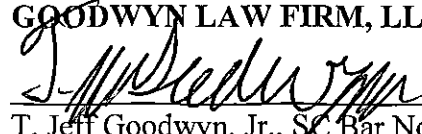
**MOTION FOR EXTENSION TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for an additional 60-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. Appellant has been attempting to obtain the hearing transcript from the Court Reporter since the filing of the Notice of Appeal and has not been successful.

On January 6, 2023, Ms. Kocsis sent an email stating the transcript would be produced in a few weeks. (See Exhibit "A"). Appellant's counsel has not received the transcript as of the date of this filing.

Appellant hereby request an additional 60-day extension to file their initial brief due to the Court Reporter needing a additional time to produce the transcript. If the extension is granted, the Initial Brief of Appellant will be due on May 19, 2023.

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr., SC Bar No. 73789

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Attorneys for Appellant

Columbia, South Carolina

March 20, 2023

From: Kocsis, Karen <kkocsis@sccourts.org>
Sent: Friday, January 6, 2023 4:17 PM
To: Charles Blackburn
Subject: Tadros v. Holder transcript 1/7/21

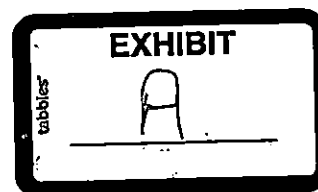
Mr. Blackburn: The estimated cost of the transcript is 80 pages (\$340) to 100 pages (\$425) at the rate of \$4.25 per page. Due to Webex hearings being new to the courts in January of 2021, we experienced technical difficulties. That being said, I will do my best to prepare a transcript hopefully with no or few "inaudibles." I usually require a deposit to secure production of the transcript in the amount listed above \$340. I guesstimated it at 80 - 100 pages due to audio cutting in and out. Please take note, I am still at work in the courthouse as I am a full-time court reporter and will do the best I can in preparing the transcript but it will be a few weeks.

Please advise as soon as possible if you still wish to secure said transcript and forward a deposit in \$340 and I will notify you if more is need when it is completed.

Thank you, Karen Kocsis, CCR

Karen A. Kocsis, Certified Court Reporter
Fifth Circuit Family Court
4 Winding Wood Court
Blythewood, SC 29016
973.332.2132

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Case No. 2019-CP-40-00919

Emad Tadros, M.D.,.....Appellant,

v.

Holder Properties, Inc.,.....Respondents.

**PROOF OF SERVICE**

I certify that I have served a copy of **Appellant’s Motion for Extension to File Initial Brief and Designation of Matter** on Douglas W. Mackelcan, Esquire, and Skylar C. Wilson, Esquire, counselors for the Respondents at the address below via email and by depositing a copy of same in the United States Mail, postage prepaid, on March 20, 2023.

Douglas W. Mackelcan, Esquire  
Skylar C. Wilson, Esquire  
Copeland, Stair, Valz & Lovell, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
[dmackelcan@csvl.law](mailto:dmackelcan@csvl.law)  
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*(Signature on next page)*

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*Attorneys for Appellant*

Columbia, South Carolina

March 20, 2023

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Charles G. Blackburn\*\*  
Jefferson D. Turnipseed\*\*

\*Also Licensed in Georgia  
† Certified Circuit Court Mediator  
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March 20, 2023

### VIA HAND DELIVERY

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

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MAR 20 2023

SC Court of Appeals

RE: *Emad Tadros, M.D. v. Holder Properties, Inc.*  
*Appellate Case No.: 2022-001434*  
*Our File No.: 4000-0007*

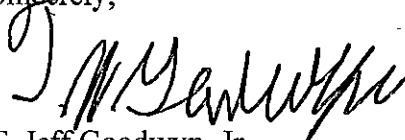
Dear Ms. Kitchings:

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

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: Douglas W. Mackelcan, Esquire  
Skyler C. Wilson, Esquire  
Emad Tadros