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SC Court of Appeals

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

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 fourteen (14) days in which to file its Initial Brief and Designation of Matter that is currently due April 9, 2023. If the extension is granted, the Initial Brief of Appellant will be due on April 24, 2023 (April 23, 2023 is a Sunday). In addition to a full caseload, Counsel for Plaintiff has a Court of Appeals initial brief and designation due April 7, 2023 (Champion Window Co. v. Evans, Appellate Case No.: 2022-001755), a summary judgment brief due April 7, 2023 in Federal Court (Coker v. Norwich Com. Group, et. al., C/A #: 3:20-cv-03071-MGL), and a summary judgment brief due April 5, 2023 along with a trial in a probate court matter April 5, 2023 (Estate of James Stephen Brown, C/A #: 2021-ES-40-01713). To compound matters, Counsel for Appellant’s paralegal has unexpectedly called out sick the entire week of April 3 – 7 with pneumonia. For a small firm, this creates significant additional work for Counsel for Appellant. For the foregoing reasons, Appellant respectfully requests an additional 14 days to submit its Initial Brief and Designation of Matter.

GOODWYN LAW FIRM, LLC



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April 5, 2023

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** Of Counsel

April 5, 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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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
Enclosures

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