

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

68776

APPEAL FROM SALUDA COUNTY
Court of Common Pleas
Kathy O. Rushton, Special Referee

Case No. 2008-CP-41-00099
Appellate Case No. 2012-208166

Bobby Jo Clark, as personal representative of
the Estate of Richard Clark,

Respondent

v.

Fairy Bell Irving, Andrew Irving, A/K/A Andrew Erving,
Alfonzo Irving, A/K/A Alfonzo Erving, John D. Irving,
A/K/A John D. Erving, William T. Irving, A/K/A William
T. Erving, Robert Irving, Sr., A/K/A Robert Erving, Sr.,
Sally May Morgan, F/K/A Sally May Irving, Minnie Lee
Butler, F/K/A Minnie Lee Irving, Joyce Thelma Taylor,
F/K/A Joyce Thelma Irving, Mary Irving, A/K/A Mary
Erving, Mamie Irving A/K/A Mamie Erving, Jessie Ina
Irving, A/K/A Jessie Ina Erving, Julious Irving, A/K/A
Julious Erving, Rashell Irving, Fairy May Irving, Thelma
Irving, Annell I. Ray, Julious Irving, Jr., Alfreda Irving,
Thelma Cartlele, Bennie Warren Butler and persons
claiming any right, title estate, interest in or lien upon the
real estate described in the complaint herein, any unknown
adults being a class designated as John Doe; and any
unknown minors or other persons under legal disability
being a class designated as Richard Roe, Defendants,

Of whom Joyce Thelma Irving is the Appellant

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JUN 18 2013

SC Court of Appeals

MOTION FOR EXTENSION OF TIME IN WHICH TO SERVE AND
FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, counsel for Bobby Jo Clark, as personal representative of the Estate of Richard Clark, respondent in this appeal, files this motion for an extension of the deadline for serving and filing respondent's initial brief and designation of matter to be included in the record on appeal, and in support of this motion says as follows:

1. Respondent's trial counsel has associated the undersigned attorney to represent respondent in this appeal.

2. Trial counsel previously sought and was granted an extension of the deadline for the filing of respondent's initial brief and designation of matter to be included in the record on appeal. The order of the Court of Appeals extended this deadline to June 19, 2013.

3. Appellate counsel respectfully requests a 30-day extension of the deadline for filing the respondent's initial brief and designation of matter to be included in the record on appeal, to July 19, 2013. This extension request is not for purposes of delay but because of counsel's heavy workload at this time.

WHEREFORE, counsel hereby respectfully moves for a 30-day extension of time in which to serve and file respondent's initial brief and designation of matter to be included in the record on appeal, to July 19, 2013.

Respectfully submitted,



Katherine Carruth Goode
229 South Congress Street
Winnsboro, South Carolina 29180
Telephone: 803-799-4440
Attorney for Respondent

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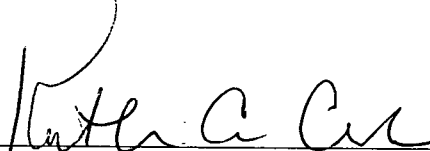
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PROOF OF SERVICE

I certify that I served a copy of the motion for extension of time in which to serve and file respondent's initial brief and designation of matter, by mail, to the appellant's attorney, Willie B. Heyward, Heirs' Property Law Center, LLC, 27 Gamecock Avenue, Suite 200, Charleston, South Carolina 29407, on June 18, 2013.



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