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Apr 27 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Debra R. McCaslin, Circuit Judge

Appellate Case No. 2022-001665

James Marshall Shoemaker, III.....Appellant

v.

Lesley R. Moore, Esq. as Personal Representative and Trustee,
Edward Sloan Shoemaker and Jonathan Evans Shoemaker.....Respondents

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

Pursuant to Rule 240, SCACR, Respondents move for an extension of time in which to file the Respondent’s Initial Brief and Designation of Matter. Respondents request an extension of thirty days to file the Initial Brief and Designation of Matter which are currently due May 15, 2023.

The former attorney in this case, Knox Haynsworth, has been diagnosed with late-stage cancer and underwent aggressive surgery on April 18, 2023. Due to treatment and surgery, Mr. Haynsworth will be unable to return to work. The undersigned attorneys need additional time to bring themselves up to speed on the case and to adequately respond to Appellant’s Initial Brief. A thirty-day delay will not prejudice the rights of any of the parties. Granting this motion would

require the Initial Brief and Designation of Matter to be filed with the Court no later than June 14, 2023.

For these reasons, Respondents request an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until June 14, 2023.

April 27, 2023

Respectfully submitted,

**BROWN, MASSEY, EVANS,
McLEOD & HAYNSWORTH,
LLC**

s/ Jenna Hendricks McLeod

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s/Tyler McLeod

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CERTIFICATE OF SERVICE

I, the undersigned, served a copy of Respondent's Motion for Extension to File Initial Brief and Designation of Matter on the following counsel of record this 27th day of April, 2023, by email and U.S. Mail to the following address of record:

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