

98932

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

RECEIVED

MAY 22 2023  
SC Court of Appeals

Michael Gene Putnam,.....Appellant,

v.

Robert Henry Purkerson, Robin Cary Maples.....Respondents.

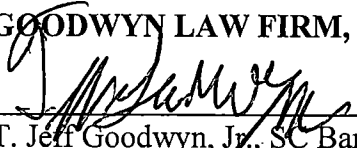
---

**MOTION FOR EXTENSION TO FILE RETURN TO RESPONDENT MAPLES'  
MOTION TO STRIKE APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

---

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for a 4-day extension in which to file his Return to Respondent Maples' Motion to Strike Appellant's Initial Brief and Designation of Matter. Respondent Maples' motion was filed May 8, 2023. Appellant incorrectly calendared the deadline to file his return for 15 days after its filing as opposed to the 10 days required under Rule 240(e). Upon preparing the Return, Counsel for Appellant realized the mistake and filed the Return immediately and contemporaneously with this motion. Appellant respectfully asks the court to grant this motion and accept the Return that is being filed contemporaneously with this motion as timely.

**GOODWYN LAW FIRM, LLC**



---

T. Jeff Goodwyn, Jr., SC Bar No. 73789  
Charles G. Blackburn, SC Bar No. 69458  
2309 Devine Street  
Columbia, SC 29205  
(803) 251-4517  
[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)  
[cblackburn@goodwynlaw.com](mailto:cblackburn@goodwynlaw.com)  
*Attorneys for Appellant*

Columbia, South Carolina  
May 22, 2023

IN THE STATE OF SOUTH  
CAROLINA  
In the Court of Appeals

RECEIVED

MAY 22 2023

SC Court of Appeals

APPEAL FROM GREENVILLE  
COUNTY CIRCUIT COURT

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

Perry H. Gravely, Circuit Court Judge

Circuit Court Case No. 2020-CP-23-01450  
Appellate Case No. 2022-001432

Michael Gene Putnam,.....Appellant,

v.

Robert Henry Purkerson and Robin Cary Maples.....Respondents.

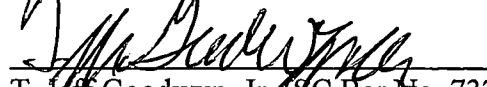
**PROOF OF SERVICE**

I certify that I have served a copy of the **Motion for Extension to File Return to Respondent Maples’ Motion to Strike Appellant’s Initial Brief and Designation of Matter** along with **Appellant’s Return to Respondent Maples’ Motion to Strike Appellant’s Initial Brief and Designation of Matter** on Wesley J. Shull, Esquire, counsel for Respondent Purkerson, and Respondent Maples, *pro se*, at the addresses below by depositing a copy of same in the United States Mail, postage prepaid, as shown, on May 22, 2023.

Wesley J. Shull, Esquire  
Wilson, Jones, Carter & Baxley  
325 Rocky Slope Road, Suite 201  
Greenville, SC 29607

Robin Cary Maples  
1450 Crane Creek Dr.  
Mt. Pleasant, SC 29466

**GOODWYN LAW FIRM, LLC**



T. Jeff Goodwyn, Jr. (SC Bar No. 73789)  
Charles G. Blackburn (SC Bar No. 69458)  
2309 Devine Street  
Columbia, SC 29205  
(803) 251-4517  
[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)  
[cblackburn@goodwynlaw.com](mailto:cblackburn@goodwynlaw.com)  
*Attorneys for Appellant*

Columbia, South Carolina  
May 22, 2023

T. Jeff Goodwyn, Jr.\*†  
Charles G. Blackburn\*\*  
Jefferson D. Turnipseed\*\*

# GOODWYN LAW FIRM, LLC

2309 Devine Street  
Columbia, South Carolina 29205

Tel. (803) 251-4517  
Fax (803) 251-4527

Email: JGoodwyn@Goodwynlaw.com  
CBlackburn@Goodwynlaw.com  
JTurnipseed@Goodwynlaw.com  
Web: www.GoodwynLaw.com

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

May 22, 2023

RECEIVED

MAY 22 2023

SC Court of Appeals

**VIA HAND DELIVERY**

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

RE: *Michael Gene Putnam v. Robert Henry Purkerson and Robin Cary Maples*  
*Case No.: 2020-CP-23-01450*  
*Appellate Case No.: 2022-001432*  
*Our File No.: 3000-0743*

Dear Ms. Kitchings:

Enclosed for filing, please find an original and one copy of a **Motion for Extension to File Return to Respondent Maples' Motion to Strike Appellant's Initial Brief and Designation of Matter** as well as an original and one copy of **Appellant's Return to Respondent Maples' Motion to Strike Appellant's Initial Brief and Designation of Matter** in regards to the above-referenced matter. Also, I have enclosed an original and one copy of the **Proof of Service** along with a check in the amount of \$50.00 representing the filing fee for the Motion.

As evidenced in the Proof of Service, I have served all interested parties with a copy of the **Motion for Extension** and the **Appellant's Return to Respondent Maples' Motion to Strick Appellant's Initial Brief and Designation of Matter**.

Thank ou 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  
Robin Cary Maples, *pro se*  
Michael G. Putnam