

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM THE RICHLAND COUNTY
COURT OF COMMON PLEAS

Nov 06 2023

SC Court of Appeals

Maite Murphy, Circuit Court Judge

Case No. 2017-CP-00-00000
Appellate Case No. 2023-001423

Alisha Baity, Aaron Baity, and Nolan Ambrose Baity.....Appellants,

v.

Geraldine Vanessa Myers-Moore.....Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S BRIEF
AND DESIGNATION OF MATTER**

Now comes the Respondent, Geraldine Vanessa Myers-Moore, by and through her undersigned counsel, and moves this Honorable Court for an Order, pursuant to Rule 263(b), SCACR, granting her a 30 day extension of time until December 8, 2023, to file and serve Respondent’s Initial Brief and Designation of Matter. In support of this motion, Respondent shows:

1. Appellants filed the Notice of Appeal on September 11, 2023.
2. Appellants filed their Initial Brief and Designation of Matter on October 9, 2023.
3. Respondent’s Initial Brief and Designation of Matter is therefore due to be filed

with this Court on November 8, 2023.

4. The undersigned counsel requires additional time to prepare Respondent's brief because:

Previous pending and overlapping commitments in other cases required significant time and attention--including drafting and filing a proposed order in a Partition action that was due October 30, 2023; several estate plans to complete; and other time constraints imposed upon Respondent's counsel (a solo practitioner) by previously scheduled matters--which precluded said counsel's ability to timely and **adequately** address the issue(s) to be raised on appeal.

5. The time for filing Respondent's Brief and Designation of Matter has not expired.

WHEREFORE, Respondent respectfully moves this Court pursuant to Rule 263(b), SCACR, for an extension of time of thirty (30) days, up to and including December 8, 2023, or whatever time the Court deems appropriate, in which to file her brief in this matter.

Respectfully Submitted,

/s/ *Joyce Farr Cheeks*

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November 6, 2023

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