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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
CIRCUIT COURT

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-20-00104
Appellate Case No.: 2023-001451

Bertha Goins,.....Respondent,

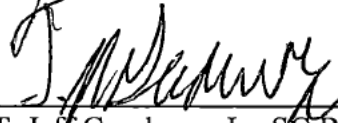
v.

Jenkinsville Water Co., Inc.,.....Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTER**

Appellant hereby moves for an additional thirty (30) days in which to file its Initial Brief and Designation of Matter that is currently due November 17, 2023. If the extension is granted, the Initial Brief and Designation of Matter will be due on December 18, 2023 (as December 17, 2023 is on a Sunday). This motion is based on the relative complexity of the issues on appeal that are involved in this case around an active trial calendar.

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Attorney for Appellant

Columbia, South Carolina
November 15, 2023

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Bertha Goins,.....Respondent,

v.


Jenkinsville Water Co., Inc.,.....Appellant.

PROOF OF SERVICE

I certify that I have served a copy of the **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter** on Samantha Sanders, Esquire; Austin T. Reed, Esquire; Daniel C. Plyler, Esquire and H. Thomas Morgan, Jr., Esquire, Attorneys for Respondent, at the address(es) below by depositing a copy of same in the United States Mail, postage prepaid, on November 15, 2023.

| | |
|--|---|
| Samantha Sanders, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205 | Austin T. Reed, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205 |
| Daniel C. Plyler, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205 | H. Thomas Morgan, Jr., Esquire Smith Robinson, LLC 935 Broad Street Camden, S.C. 29020 |

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November 15, 2023

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

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

November 15, 2023

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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: *Bertha Goins v. Jenkinsville Water Company, Inc.*
Civil Action No.: 2022-CP-20-00104
Appellate Case No.: 2023-001451
Our File No.: 3550-0001

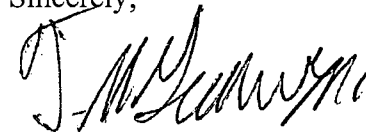
Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of **Appellant's Motion for Extension of Time to File Initial Brief** and **Designation of Matter** along with an original and one copy of the Proof of Service in regards to the above referenced matter. Please return a filed copy of same to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees.

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/msb
Enclosures

cc: Samantha Sanders, Esquire
Austin T. Reed, Esquire
Daniel C. Plyler, Esquire
H. Thomas Morgan, Jr., Esquire