

**RECEIVED**

**Nov 15 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

**APPEAL FROM HORRY COUNTY  
ALAN D. CLEMMONS, MASTER-IN-EQUITY**

---

**Appellate Case No. 2023-001419  
Lower Court Case No. 2021-CP-26-00144**

United States of America acting through the  
Rural Housing Service or successor agency,  
United States Department of Agriculture, ..... Appellant

v.

Patricia A. White a/k/a Patricia Ann White,  
and Family Services, Inc., ..... Respondents

---

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF APPELLANT  
UNITED STATES OF AMERICA ACTING THROUGH THE RURAL HOUSING  
SERVICE OR SUCCESSOR AGENCY, UNITED STATES DEPARTMENT OF  
AGRICULTURE AND DESIGNATION OF MATTER**

---

Appellant United States of America acting through the Rural Housing Service or successor agency, United States Department of Agriculture (hereinafter “Appellant”) by and through its undersigned counsel respectfully requests a 30 day extension of time or until December 15, 2023 to file the Initial Brief and Designation of Matter for Appellant which is currently due on November 20, 2023. The request is based on counsel’s and their staffs’ workload demands, other commitments, and issues encountered in obtaining the Transcript of Hearing.

Prior to filing this Motion, counsel for Appellant consulted with the Guardian ad Litem for Respondent Patricia A. White a/k/a Patricia Ann White and he consented to same.

s/ Jamie Anna Weller \_\_\_\_\_  
Taylor A. Peace  
Jamie Anna Weller  
HARRELL, MARTIN & PEACE, P.A.  
135 Columbia Avenue  
Chapin, South Carolina 29036  
Phone: (803) 345-3353  
tpeace@hmp-law.com  
jweller@hmp-law.com  
ATTORNEYS FOR APPELLANT

November 15, 2023

Other counsel of record:  
Thomas D. Kilpatrick  
Murphy & Kilpatrick, LLP  
2512 Devine St.  
Columbia, South Carolina 29205  
Phone: (803) 254-7091  
tkilpatrick@murphykilpatrick.com  
Guardian *ad Litem* for  
Patricia A. White a/k/a Patricia Ann White

RECEIVED

Nov 15 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY  
ALAN D. CLEMMONS, MASTER-IN-EQUITY

Appellate Case No. 2023-001419  
Lower Court Case No. 2021-CP-26-00144

United States of America acting through the  
Rural Housing Service or successor agency,  
United States Department of Agriculture, ..... Appellant

v.

Patricia A. White a/k/a Patricia Ann White,  
and Family Services, Inc., ..... Respondents

PROOF OF SERVICE

I certify that I have served the Motion For Extension of Time to File Initial Brief of Appellant United States of America Acting through the Rural Housing Service or Successor Agency, United States Department Of Agriculture And Designation Of Matter by depositing a copy of it in the United States Mail, postage prepaid on November 15, 2023, addressed to the court appointed guardian *ad litem* for Respondent Patricia A. White a/k/a Patricia Ann White, Thomas D. Kilpatrick, Murphy & Kilpatrick, LLP, 2512 Devine Street, Columbia, South Carolina 29205, Respondent Patricia A. White a/k/a Patricia Ann White, 3470 Hwy 917, Loris, South Carolina 29569, and Respondent Family Services, Inc., addressed to 8084 Rivers Avenue, Suite 100, North Charleston, South Carolina 29406.

s/ Jamie Anna Weller  
Taylor A. Peace  
Jamie Anna Weller  
HARRELL, MARTIN & PEACE, P.A.  
135 Columbia Avenue  
Chapin, South Carolina 29036  
Phone: (803) 345-3353  
tpeace@hmp-law.com  
jweller@hmp-law.com  
ATTORNEYS FOR APPELLANT

November 15, 2023

RECEIVED

Nov 15 2023

SC Court of Appeals



---

L.K. "Trey" Harrell, III  
Jeremy C. Martin  
M. Alan Peace \*\*  
Taylor A. Peace  
Erik T. Norton  
Jamie Anna Weller  
George "Mick" Lusk, III

Robert W. Dibble, Jr. \*  
William Jennings (Bill) Buchanan \*  
Donald W. Tyler \*  
Thomas B. Jackson, III \*\*

\*Of Counsel  
\*\*Certified Mediator/Arbitrator

---

November 15, 2023

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: United States of America, acting through the Rural Housing Service or successor agency,  
United States Department of Agriculture, Appellant v. Patricia A. White, and Family  
Services, Inc, Respondents  
Case No. 2023-001419  
Our File Number: 2518.28553/TAP

Dear Ms. Kitchings:

Our office requested the Transcript of Hearing on September 22, 2023. Thereafter, we learned Court Administration did not have a record of the hearing. Subsequently we obtained the original Webex recording from Judge Clemmons' office on September 22, 2023 and forwarded same to Court Administration for transcription. Court Administration indicated it could not transcribe the hearing from the Webex recording and directed our office back to Judge Clemmons' office by email on September 26, 2023. Judge Clemmons' office indicated a transcript could not be provided and directed our office to contact Webex for any services available to obtain a transcript by email on September 26, 2023. Ultimately we obtained a Transcript of the Hearing from a private court reporter on October 20, 2023 and were able to download same on November 10, 2023.

It is my understanding we can submit the Webex hearing video, the Transcript of Hearing, and Record of Hearing, which together incorporates provides a complete record of the final hearing.

Also, enclosed please find our Motion for Extension of Time to File Initial Brief of Appellants and Designation of Matter. We are providing our \$50.00 motion filing fee a copy of same by regular mail.


---

**Mailing Address: Post Office Box 1000, Chapin, South Carolina 29036**  
**Physical Address: 135 Columbia Avenue, Chapin, South Carolina 29036**  
Telephone: 803-345-3353 • Fax: 803-345-9171  
harrellmartinpeace.com

Please let me know if you have any questions and/or concerns. Your assistance is greatly appreciated.

Respectfully,

HARRELL, MARTIN & PEACE, P.A.



Jamie Anna Weller

Enclosure

Cc: South Carolina Office of Court Administration  
Thomas Kilpatrick, guardian *ad litem* for Patrica A. White a/k/a Patricia Ann White  
Patricia A. White a/k/a Patricia Ann White  
Family Services, Inc.