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Dec 04 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity Court

The Honorable Mikell R. Scarborough

Appellant Case Number: 2023-001428

Edward Mikell, Individually and as Personal Representative for the Estate of Estelle White,
deceased,..... Respondent,

vs.

Mary Ann Green, Elnora Capers, William Mikell, Eloise Chestnut, Ralph Brown, Roges Brown, Raymond Mack, Henrietta J. Mack-Barnette, Jeanette Mack Green, James Mack, Jo Nathan Mack a/k/a Nathan Mack, Ida M. Blake, Glenn Mack, Rose Mack, Elizabeth Lee a/k/a Dorothy Marie Mack Lee, Michael Mack, Harvey Mack, Carolyn McClair, Magaline E. Brown, Delores G. Mack, Charles Mack III, Alton Kirk Mack a/k/a Kirk Mack, Kendall Gibbs, Harold Mack, Walter Brown (son of Cumsey Brown), Albertha Cohen, Jessie M. Washington, Manny Dunmeyer Jr., Ruthie Brown Roper, Sylvia Dunmeyer, Francis Dunmeyer, Tammy Dunmeyer, Brandy Dunmeyer, Timothy Brown, Barbara Ann Gathers aka Barbara Ann Geathers, Clarence Smith, Jr., Lillian Middleton, Pauline Walker a/k/a Pearline Washington, Robert Smith, Arthur Smith, Margaret Brown, Georgiana Smith, Louise Hamilton, Benjamin Smith, John Smith, Leola Smith, Michael Smith, Janet Heyward Nelson, Eric Heyward, Keith Heyward, Darrell Heyward, William Heyward, Charlene Gadsden, Richard Brown, Sr., Sharon Y. Brown, Merele J. Mack, Adrienne F. Mack a/k/a Frankie Mack, Michael Brown, Louis Mikell, Janie Mikell, Altamese Brown, LaTricia Brown-Mayfield, and Edward Littleton Brown, Melissa Mikell (daughter of Nicolas Mikell), Tomisha Mikell, Thomas Elliott Mikell, Meliss Mikell (daughter of Thomas Mikell), Les Brown, Patricia Campbell, Curtrina Ladson, if they be alive, and JOHN DOE AND JANE DOE, whose true names are unknown and fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors, or assigns of the above-named Defendants and if any of them be dead and of Estelle White, Lizzie Mikell Green, Edward Mikell, Emily Mikell Brown, Zeebree Mikell, Marion Green a/k/a Marian Green, Walter Brown, Florence Gadsden, Ida Mack, Charles Mack Jr., Geneva Mack, Franklin Mack Cumsey Brown, Nancy Brown, James Brown, Emily Heyward, Ida Mae Smith Dunmeyer, Pamela Dunmeyer Brown, Elizabeth Dunmeyer, Charles Brown, Jr., Rena Smith, Johnny Brown, Adell Mikell, Nicolas Mikell, Jesse Mikell, Thomas Mikell, and Mary Frances Brown, all deceased; and MARY ROE AND RICHARD ROE, whose true names are unknown and fictitious names designating infants, persons under disability, incompetents, imprisoned, or those person in the military, if any; and all other persons, known or whose true names are unknown, claiming any right, title, interest in, or lien upon the real estate described in the Complaint herein,.....Defendants,

Of whom Richard Brown, Sr. and Sharon Y. Brown are the.....Appellants,

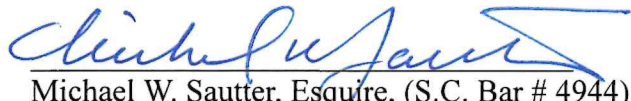
MOTION FOR EXTENSION

Appellants, Richard Brown, Sr. and Sharon Y. Brown, respectfully move this Court for a seven (7) day extension of time from December 4, 2023, until December 11, 2023, by which to file and serve their Initial Brief. Appellants' Motion is based on the grounds that counsel Michael W. Sautter, lead counsel for Appellants, travelled to Washington state through the Thanksgiving Holidays and was under an Order of Protection ending December 1, 2023. That Appellants require additional time to prepare the Initial Brief and Designate Matters to be Included in the Record on Appeal.

Undersigned counsel affirms that he has communicated with the law office of Kathryn Cockrill, trial counsel for Respondent, as to the proposed extension and has not yet received a response.

Wherefore, Appellants Richard Brown, Sr. and Sharon Y. Brown, respectfully request that they be allowed an additional 7 days, until December 11, 2023, by which to file and serve their Initial Brief and to Designate Matters to be Included in the Record on Appeal.

December 4, 2023


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Attorneys for Appellants

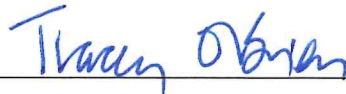
Other Counsel of Record:
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Attorneys for Respondent

PROOF OF SERVICE

I hereby certify that I served a copy of the Motion for Extension on Edward Mikell, Individually and as Personal Representative for the Estate of Estelle White, deceased, by emailing and via US Mail by placing a copy of same in the United States Mail, with sufficient postage attached addressed to his attorneys of record, Kathryn Cockrill and Jessica L. Duffy as follows:

Kathryn M. Cockrill, Esquire
Jessica L. Duffy, Esquire
Law Office of Kathryn M. Cockrill, LLC
PO Box 12367
Charleston SC, 29422
kathryn@cockrillstatelaw.com

Attorneys for Respondent



December 4, 2023

O. Grady Query
Certified Circuit Court
Arbitrator & Mediator
Certified National Trial
Advocacy Civil Trial Specialist



Michael W. Sautter
Managing Partner

Nicholas Uricchio
Associate Attorney

Query Sautter & Associates, LLC
Attorneys and Counselors at Law

December 4, 2023

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SC Court of Appeals

VIA EMAIL & US MAIL

Catherine Harrison
Chief Deputy Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

RE: Edward Mikell v. Richard Brown, Sr.
Appellate Case number: 2023-001428

Dear Ms. Harrison:

Enclosed herewith for filing, please find an original and six copies of our Motion for Extension regarding the referenced matter along with our \$50.00 check for associated filing fees. Please file the original and return the clocked copies to me in the enclosed envelope. By copy of this letter with enclosure, I am serving Kathryn M. Cockrill and Jessica L. Duffy.

Thank you.

Sincerely,

Tracey O'Brien
Assistant to Michael W. Sautter

Enclosures

cc: Kathryn M. Cockrill, Esquire
Jessica L. Duffy, Esquire

