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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

RECEIVED

DEC 21 2023

SC Court of Appeals

Bertha Goins,.....Respondent,

v.

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

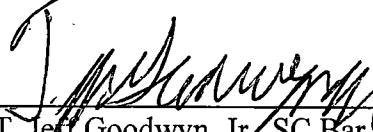
**MOTION FOR EXTENSION TO FILE AND SERVE APPELLANT'S INITIAL BRIEF
AND DESIGNATION OF MATTER**

Appellant, by and through its undersigned attorney, hereby moves this Honorable Court for a three day extension in which to file Appellant's Initial Brief and Designation of Matter. The Initial Brief and Designation of Matter was due on December 18, 2023. Due to human error and all staff in our office having Covid in late November through mid December, the deadline was not properly calendared and Counsel for Appellant is requesting the Court to grant a three day extension to file Appellant's Initial Brief and Designation of Matter and to accept the Initial Brief and Designation of Matter that is being filed contemporaneously with this motion as timely filed.

Appellant asserts that granting this motion will cause no prejudice against Respondent.

Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr., SC Bar No. 73789

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Attorney for Appellant

Columbia, South Carolina
December 21, 2023

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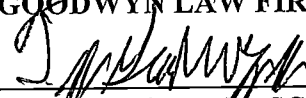
PROOF OF SERVICE

I certify that I have served a copy of the **Motion for Extension to File and Serve Appellant's Initial Brief and Designation of Matter**, upon Samantha S. Owens, Esquire; Austin T. Reed, Esquire; Daniel C. Plyler, Esquire; Sydney J. Douglas, 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 December 21, 2023.

| | |
|---|---|
| Samantha S. Owens, 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 |
| Sydney J. Douglas, Esquire Smith Robinson, LLC 2530 Devine Street Columbia, SC 29205 | |

Columbia, South Carolina
December 21, 2023

GOODWYN LAW FIRM, LLC



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

December 21, 2023

VIA HAND DELIVERY

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

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DEC 21 2023

SC Court of Appeals

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 **Motion for Extension to File and Serve Appellant's 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.

Also, enclosed for filing, please find an original and one copy of **Appellant's Initial Brief** and **Designation of Matter** along with an original and one copy of the Proof of Service.

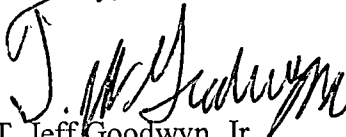
Please return the filed copies of same to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees.

As evidenced in the Proofs of Service, I have served all interested parties, with a copy of these documents.

GOODWYN LAW FIRM, LLC

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 S. Owens, Esquire
Austin T. Reed, Esquire
Daniel C. Plyler, Esquire
Sydney J. Douglas, Esquire
H. Thomas Morgan, Jr., Esquire