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Jan 16 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

The Honorable Brian M. Gibbons
Circuit Court Judge

Civil Action No. 2022-CP-20-00104

Appellate Case No. 2023-001451

Bertha Goins, Respondent,

v.

Jenkinsville Water Company Inc., Appellant.

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

Respondent, by and through its undersigned attorneys, hereby moves this Honorable Court for an extension of thirty (30) days in which to file Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal. The current deadline is January 20, 2024. The requested extended deadline would be February 19, 2024.

The reason for this request is that the Appellant’s Initial Brief and Designation of Matter of Matter to be Included in the Record on Appeal was filed right before the Christmas holiday and pre-planned holiday travels delayed the preparation of Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is Respondent’s first request for extension.

(signature page to follow)

SMITH | ROBINSON

Smith Robinson Holler DuBose and Morgan, LLC

s/H. Thomas Morgan, Jr.

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s/Daniel C. Plyler

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ATTORNEYS FOR RESPONDENT

Camden, South Carolina

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Bertha Goins, Respondent,

v.

Jenkinsville Water Company Inc., Appellant.

PROOF OF SERVICE

I, the undersigned paralegal of the law offices of Smith Robinson Holler DuBose and Morgan, LLC, attorneys for Respondent Bertha Goins, do hereby certify that on January 16, 2024, I have served all counsel in this action with a copy of the document hereinbelow in accordance with the Supreme Court's Administrative Order by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System.

Document Served: Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter

Counsel Served: Via E-Mail Only
Thomas Jefferson Goodwyn, Jr., Esq.
jgoodwyn@goodwynlaw.com
Goodwyn Law Firm, LLC
Attorney for Appellant



Sherry Roth, Paralegal

January 16, 2024

Sherry Roth

From: Sherry Roth
Sent: Tuesday, January 16, 2024 10:38 AM
To: jgoodwyn@goodwynlaw.com
Cc: Tommy Morgan; Daniel C. Plyler; Austin Reed; Sydney Douglas; Melissa S. Segear; Mary Bush
Subject: Goins v Jenkinsville Water Company Inc. (Appellate Case No., 2023-001451)
Attachments: 2024.01.16 Respondent Request for Extension to Respond to Appellant Initial Brief.pdf; Proof of Service (01.16.24).pdf

Good morning, Counselor:

Please find attached the Respondent's Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter and Proof of Service in *Goins v Jenkinsville Water Company Inc.*, Appellate Case No. 2023-001451, which we are electronically filing with the Court of Appeals today, served on you pursuant to the South Carolina Appellate Court Rules.

Thank you,
Sherry

SMITH ROBINSON
Forward thinking. Results driven.
Smith Robinson Holler DuBose and Morgan, LLC
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Sherry Roth
Paralegal

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Jan 16 2024

SMITH ROBINSON

Forward thinking. Results driven. **SC Court of Appeals**

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January 16, 2024

Via U.S. Mail and E-mail to: ctappfilings@sccourts.org

South Carolina Court of Appeals Clerk
1220 Senate Street
Columbia, SC 29201

RE: Bertha Goins v. Jenkinsville Water Company, Inc.
C/A No. 2022-CP-20-00104, Appellate Case No. 2023-001451

Dear Court of Appeals Clerk:

Counsel for Respondent hereby respectfully requests a thirty (30) day extension of time in which to file their Respondent's Initial Brief and Designated Record. The Appellant's Initial Brief and Designation of Matter was filed on December 21, 2023, making Respondent's Initial Brief due on January 20, 2024. With the extension, that would make a response due on or before **February 19, 2024**. This is the first extension request in this case for the Respondent.

Enclosed for filing, please find the original and one copy of Respondent'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, all interested parties have been served, with a copy of this Motion.

Thank you for your kind attention and consideration.

Sincerely,



H. Thomas Morgan, Jr.
Sydney Douglas
Daniel C. Plyler

Austin T. Reed
ATTORNEYS FOR RESPONDENT

HTM/sr
Enclosures

cc: Thomas Jefferson Goodwyn, Jr., Esq (via email)