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Feb 01 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity Charleston County

Case No. 2017-CP-10-5427  
Appellate Case No. 2021-000793

Family Services, Inc., as Conservator for Muriel W. Clarkin.....Respondent,

v.

Patricia Clarkin Smith and Wells Fargo Bank, NA., Defendants,  
Of whom Patricia Clarkin Smith is the ..... Appellant.

NOTICE OF MOTION AND MOTION  
FOR AN EXTENSION OF TIME TO  
FILE THE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER OF RESPONDENT

Respondent, Family Services, Inc., as Conservator for Muriel W. Clarkin by and through its undersigned counsel, respectfully moves before this Court for an order granting Respondent a fifteen (30) day extension of time or until March 2, 2024, in which to file Respondent’s Initial Brief and Designation of Matter to be included in the Record of Appeal. The grounds for the motion are that Respondent's counsel has deadlines and noticed court appearances in other matters scheduled requiring counsel’s attention.

February 1, 2024.

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC  
s/ D. Conor Keys  
D. Conor Keys (100148)  
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*Attorney for Respondent*

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PROOF OF SERVICE

I certify that on this 1st day of February 2024, I have served the motion for extension upon Appellant’s counsel by electronic mail via counsel’s email as listed on AIS.

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*Attorney for Respondent*

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February 1, 2024

Jenny Abbott Kitchings  
Clerk of Court, Court of Appeals  
P.O. Box 11629  
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**SC Court of Appeals**

**RE: Family Services, Inc., Conservator for Muriel W. Clarkin v. Patricia  
Clarkin Smith  
App. Case No. 2021-000793**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellant's Motion for Extension of Time to file Respondents Initial Brief and Designation of Matter;
- 2) Proof of Service for the Motion; and
- 3) Check for \$50.00 for the filing fee.

I kindly request that you file the same

With kind regards,

RESPECTUFLY SUBMITTED,

THE LAW OFFICE OF  
DAVID CONOR KEYS, LLC



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*Attorney for Respondent*

Enclosures:  
(as stated)  
CC:  
Deborah D. Davis, Esq.