

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

6-11-12

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

RECEIVED

Patrick R. Watts, Special Referee

AUG 13 2013

Case No. 2013-000608

SC Court of Appeals

Irving T. Geddis, Jr., Harry M. Carroll, Barbara C. Stancil, & Joanne C. Wade.....Respondents,

v.

Rebecca Geddis, Patricia Ann Geddis, Cleveland Geddis, John Henry Geddis, Herman Geddis, George Geddis, Patrice Geddis, Joenatham Geddis, Yvonne Geddis Bowens, Gwendolyn P. Spell, Harry P. Geddis, Catherine Goodwin a/k/a Catharing Goodwine, Jessie Goodwine, and any individual who may be claiming an interest in this action as an heir of these individuals, and MWV Community Development and Land Management, LLC, and John Doe and Jane Doe, fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors or assigns of the Defendants named above, and Richard Roe and Mary Roe, fictitious names designating infants and persons under any disability or incompetent, including those persons who might be in the Military Services within the meaning of The Soldier's and Sailor's Civil Relief Act of 1941, Title 50, United States Code, and any other person or legal entity who or which has or claims to have any right title, interest or lien in or to the real property described in this Complaint, Defendants,

Of whom Patrice Geddis is the.....Appellant.

MOTION FOR EXTENSION OF TIME

The Appellant, Patrice Geddis, by and through her undersigned attorney, W. Scott Palmer, Esquire, respectfully moves this Court for an extension of time to file its Initial Brief. The grounds for this motion are as follows:

1. W. Scott Palmer, Esquire has been substituted as appellate counsel, was not in attendance at either hearing in lower court, and is still in the process of gathering materials to complete the record, which is necessary for the Appellant's Initial Brief.
2. Two hearings were conducted in the lower court in this case, neither of which was recorded by a court reporter. It appears that the Special Referee's findings and conclusions are based upon documents presented at both hearings; however, there is no indication that any documents were formally offered or accepted into

evidence. Counsel therefore requires additional time to investigate and confirm these findings in order to assemble accurate record upon which Appellant's Initial Brief will be based.

The grounds for this motion are the applicable laws of this State. It will be no hardship, prejudice, or impediment resulting from the filing of the Appellant's Initial Brief out of time.

August 9, 2013

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right, positioned above a solid horizontal line.

W. Scott Palmer
SC Bar No. 011936
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(803) 854-4417
ATTORNEY FOR APPELLANT PATRICE GEDDIS

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Of whom Patrice Geddis is the.....Appellant.

PROOF OF SERVICE

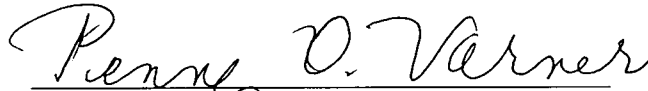
I certify that I have served a copy of the Motion for Extension, by depositing a copy of it in the United States Mail, postage prepaid, on August 9, 2013, addressed to the following individuals:

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MWV Community Development
and Land Management, LLC

August 9, 2013



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