

RECEIVED

May 23 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Franklin J. Smith, Jr., Special Referee

Appellate Case No.: 2024-000282
Civil Action No.: 2021-CP-18-02238

Virginia B. Crum, Elizabeth Crum-Huffman, Fred Crum, Sr.,
Mattie Middlebrooks, Lula Bryant, Wilhemenia King, Juanita Hill,
and Hazel Parson-Starks,Appellants,

v.

Dorchester County, Ashley River Lumber Company, Inc., and
Joe Henry Branton, Sr..... Respondents.

**RESPONDENTS DORCHESTER COUNTY,
ASHLEY RIVER LUMBER COMPANY, INC., AND
JOE HENRY BRANTON, SR.'S
JOINT MOTION FOR EXTENSION OF TIME**

Pursuant to South Carolina Appellate Court Rules 240 and 263(b),
Respondents Dorchester County, Ashley River Lumber Company, Inc., and Joe Henry
Branton, Sr. move for an extension of thirty (30) days from the existing deadline of
May 30, 2024 to file their Joint Initial Brief and Joint Designation of Matter to be
Included in the Record on Appeal. Respondents' Joint Initial Brief and Joint

Designation of Matter to be Included in the Record on Appeal will be due on or before July 1, 2024 if the extension is granted.

Respondents respectfully submit that a thirty (30) day extension to file their Initial Brief and Designation of Matter is appropriate due to Respondents' counsel's existing work demands and to allow the parties to continue to engage in settlement discussions.

For the reasons set forth herein, Respondents request an extension until July 1, 2024 to file and serve their Joint Initial Brief and Joint Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

s/ E. Brandon Gaskins
E. Brandon Gaskins (S.C. Bar No. 73274)
Moore & Van Allen PLLC
78 Wentworth Street
Charleston, SC 29401
Telephone: (843) 579-7000
Facsimile: (843) 579-7099
brandongaskins@mvalaw.com

*Attorney for Respondents
Ashley River Lumber Company, Inc. and
Joe Henry Branton, Sr.*

AND

s/ John Frampton

John Frampton, Esq. (S.C. Bar No. 2110)

Dorchester County Attorney

201 Johnston Street

St. George, SC 29477

jframpton@dorchestercountysc.gov

Attorney for Respondent Dorchester County

May 23, 2024

Charleston, South Carolina

RECEIVED

May 23 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Franklin J. Smith, Jr., Special Referee

Appellate Case No.: 2024-000282
Civil Action No.: 2021-CP-18-02238

Virginia B. Crum, Elizabeth Crum-Huffman, Fred Crum, Sr.,
Mattie Middlebrooks, Lula Bryant, Wilhemenia King, Juanita Hill,
and Hazel Parson-Starks,Appellants,

v.

Dorchester County, Ashley River Lumber Company, Inc., and
Joe Henry Branton, Sr..... Respondents.

PROOF OF SERVICE

This is to certify that I have this day served counsel in the foregoing matter
with a copy of ***Respondents Dorchester County, Ashley River Lumber Company, Inc.,
and Joe Henry Branton, Sr.'s Joint Motion for Extension of Time***, via electronic mail
only, addressed as follows:

W. Andrew Gowder, Jr., Esq.
Austen & Gowder, LLC
1629 Meeting Street, Suite A
Charleston, SC 29405
andy@austengowder.com

*Attorney for Appellants Virginia B. Crum, Elizabeth Crum-Huffman, Fred Crum, Sr.,
Mattie Middlebrooks, Lula Bryant, Wilhemenia King, Juanita Hill, and Hazel
Parson-Starks*

John Frampton, Esq.
Dorchester County Attorney
201 Johnston Street
St. George, SC 29477
jframpton@dorchestercountysc.gov

Attorney for Respondent Dorchester County

s/ E. Brandon Gaskins
E. Brandon Gaskins (SC Bar No. 73274)
Moore & Van Allen PLLC
78 Wentworth Street
Charleston, SC 29401
Telephone: (843) 579-7000
Facsimile: (843) 579-7099
brandongaskins@mvalaw.com

*Attorney for Respondents
Ashley River Lumber Company, Inc. and
Joe Henry Branton, Sr.*

May 23, 2024
Charleston, South Carolina

May 23, 2024

E. Brandon Gaskins
Attorney at Law

T 843 579 7038
F 843 579 8738
brandongaskins@mvalaw.com

VIA E-FILING

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Moore & Van Allen PLLC

78 Wentworth Street
Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

**Re: Virginia B. Crum, Elizabeth Crum-Huffman, Fred Crum, Sr., Mattie Middlebrooks, Lula Bryant, Wilhemenia King, Juanita Hill, and Hazel Parson-Starks vs. Dorchester County, Ashley River Lumber Company, Inc., and Joe Henry Branton, Sr.
Appellate Case No.: 2024-000282
MVA File No.: 047648.000002**

Dear Ms. Kitchings:

With regard to the above-referenced matter, please accept the enclosed **Respondents Dorchester County, Ashley River Lumber Company, Inc., and Joe Henry Branton, Sr.'s Joint Motion for Extension of Time and Proof of Service** for filing. The required filing fee in the amount of \$50.00 is being mailed to the Court under separate cover.

By copy of this letter, I am serving Appellant's attorneys with a copy of the Joint Motion for Extension of Time.

Thank you for your assistance in this matter. If you should have any questions or concerns, please don't hesitate to contact me.

Sincerely,



E. Brandon Gaskins

EBG/lp

Enclosures: As Stated.

cc: **VIA EMAIL ONLY**
W. Andrew Gowder, Jr., Esq.
John Frampton, Esq.