

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
G.D. Morgan, Circuit Court Judge

Appellate Case No.: 2024-001071

Stephanic Chappell, Respondent,

vs.

Johnny Mack Brown, Appellant.

MOTION FOR EXTENSION OF TIME FOR APPELLANT
TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD OF APPEAL

Pursuant to Rule 250, SCACR, Appellant Stephanic Chappell moves for an extension of time in which to serve and file the Appellant’s Initial Brief and Designation of Matter to be included in the Record on Appeal (“Designation of Matter”). Appellant requests an extension of thirty (30) days to file and serve the Initial Brief and Designation of Matter which are currently due July 30, 2024. This is the first request for an extension filed by the Appellant.

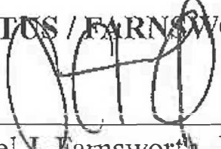
The grounds for this motion are that other impending professional matters have created a need for additional time to prepare the Initial Brief and Designation of Matter. A thirty day delay will not prejudice the rights of any of the parties. Counsel for the Respondent consents to this request.

Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than Monday, August 29, 2024.

For these reasons, Appellant requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until August 29, 2024.

Dated this 28th day of July, 2024.

PETTUS / FARNSWORTH, LLC

BY: 
Daniel J. Farnsworth, Jr. (SC Bar 6922)
211 Pettigru Street (29601)
Post Office Box 8719
Greenville, South Carolina
Telephone: (864) 250-9119
Facsimile: (864) 250-9120
Dan@FarnsworthLawOffices.com



Lauren Lipscomb <lauren@farnsworthlawoffices.com>

Chappell Extension

7 messages

Lauren Lipscomb <Lauren@farnsworthlawoffices.com> Sun, Jul 28, 2024 at 11:00 AM
To: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>, Russell Harter <rwhjr@chhlaw.net>

Hi Patty-

I hope you are well and had a great week. Will you ask Mr. Harter if he agrees to a 30 day extension for our initial brief and designation of matter? It is due Tuesday. Dan has been in trial these past several weeks, dealing with other appeal deadlines (one due monday), and will be in trial this week. Additionally, he has a trial starting August 12 (date certain #1)

We would greatly appreciate Rusty's consent. We plan on filing a motion tomorrow afternoon

Best,

Lauren

Sent from my iPhone

Russell Harter <rwhjr@chhlaw.net> Sun, Jul 28, 2024 at 12:50 PM
To: Lauren Lipscomb <Lauren@farnsworthlawoffices.com>
Cc: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>

I consent
Rusty
Russell W. Harter, Jr.
Chapman, Harter & Harter, PA
14 Lavinia Avenue
P.O. Box 10224 (29603)
Greenville, SC 29601
Main: (864) 233-4500
Fax: (864) 232-1710

> On Jul 28, 2024, at 11:00 AM, Lauren Lipscomb <Lauren@farnsworthlawoffices.com> wrote:

>

> Hi Patty-

[Quoted text hidden]

Lauren Lipscomb <Lauren@farnsworthlawoffices.com> Sun, Jul 28, 2024 at 12:57 PM
To: Russell Harter <rwhjr@chhlaw.net>
Cc: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>

Thank you! I will let Dan know. We are in the office preparing for trial so we may go ahead and file the motion today. You'll be copied on the correspondence.

Have a wonderful rest of your weekend!

Best,

Lauren

[Quoted text hidden]

Russell Harter <rwhjr@chhlaw.net>

Sun, Jul 28, 2024 at 1:25 PM

To: Lauren Lipscomb <lauren@farnsworthlawoffices.com>

Cc: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>

Has a transcript been ordered or provided ?

Rusty

Russell W. Harter, Jr.

Chapman, Harter & Harter, PA

14 Lavinia Avenue

P.O. Box 10224 (29603)

Greenville, SC 29601

Main: (864) 233-4500

Cell: (864) 230-3669

Fax: (864) 232-1710

rwhjr@chhlaw.net

On Jul 28, 2024, at 12:58 PM, Lauren Lipscomb <lauren@farnsworthlawoffices.com> wrote:

[Quoted text hidden]

Lauren Lipscomb <Lauren@farnsworthlawoffices.com>

Sun, Jul 28, 2024 at 3:10 PM

To: Russell Harter <rwhjr@chhlaw.net>

Cc: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>

Yes sir, it was requested June 28 and received June 30. A notice is being filed with the Court advising them of this, as well as our motion as previously mentioned.

Lauren

[Quoted text hidden]

--

Lauren O. Lipscomb

Firm Manager and Senior Litigation Paralegal to

Daniel J. Farnsworth, Jr.

Pettus | Farnsworth, LLC

211 Pettigru Street (29601)

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INJURY LAW and WRONGFUL DEATH
NURSING HOME ABUSE

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POLICE MISCONDUCT

EMPLOYMENT LAW
and BUSINESS LITIGATION

South Carolina Office:

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Virginia Office:

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Keysville, Virginia 23947
434.736.8171

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Russell Harter <rw hjr@chhlaw.net>

Sun, Jul 28, 2024 at 3:42 PM

To: Lauren Lipscomb <Lauren@farnsworthlawoffices.com>

Cc: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>

Thank you....Did you send transcript to us yet ?

Rusty

Russell W. Harter, Jr.
Chapman, Harter & Harter, PA
14 Lavinia Avenue
P.O. Box 10224 (29603)
Greenville, SC 29601
Main: (864) 233-4500
Fax: (864) 232-1710

On Jul 28, 2024, at 3:11 PM, Lauren Lipscomb <Lauren@farnsworthlawoffices.com> wrote:

[Quoted text hidden]

Lauren Lipscomb <Lauren@farnsworthlawoffices.com>

Sun, Jul 28, 2024 at 4:38 PM

To: Russell Harter <rw hjr@chhlaw.net>

Cc: Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>

Please see attached. Have a great rest of your Sunday.

Lauren

[Quoted text hidden]



Transcript from 2-13-23.pdf

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Jul 29 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
G. D. Morgan, Circuit Court Judge

Appellate Case No.: 2024-001071

Stephanie Chappell Respondent,

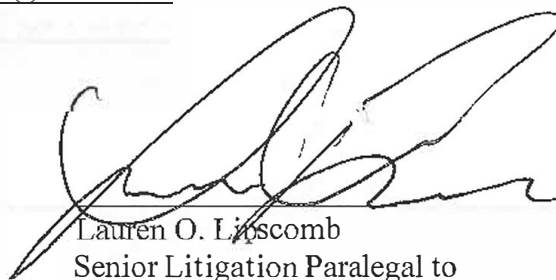
vs.

Johnny Mack Brown, Appellant.

CERTIFICATE OF SERVICE

The undersigned paralegal of **PETTUS / FARNSWORTH, LLC**, counsel for the Appellant, does hereby certify that of the Appellant's Motion for Extension to file Initial Brief and Designation of Matter in the above-captioned matter was sent by electronic mail, at the below listed addresses clearly indicated on said envelopes this the 28th day of July, 2024.

Russell W. Harter, Jr.
Chapman, Harter & Harter, PA
rwhjr@chhlaw.net



Lauren O. Lipscomb
Senior Litigation Paralegal to
Daniel J. Farnsworth, Jr. (SC Bar 6922)
PETTUS | FARNSWORTH, LLC
211 Pettigru Street
Greenville, South Carolina 29601
Lauren@FarnsworthLawOffices.com

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
G.D. Morgan, Circuit Court Judge for
the Thirteenth Judicial Circuit

Appellate Case No.: 2024-001071

Stephanie Chappell, Respondent,

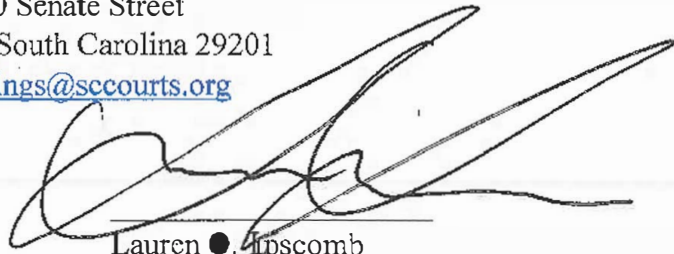
vs.

Johnny Mack Brown, Appellant.

CERTIFICATE OF SERVICE

The undersigned paralegal of PETTUS / FARNSWORTH, LLC, counsel for the Appellant, does hereby certify that six (6) copies of the Appellant’s Motion for Extension to file Initial Brief and Designation of Matter in the above-captioned matter was sent by electronic mail and by placing in the United States Mail, first class postage prepaid, along with the filing fee of \$50.00, at the below listed addresses clearly indicated on said envelopes this the 28th day of July, 2024.

The South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org



Lauren ● Lipscomb
Senior Paralegal to
Daniel J. Farnsworth, Jr. (SC Bar 6922)
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Lauren@FarnsworthLawOffices.com

RECEIVED

Jul 29 2024

SC Court of Appeals

PETTUS

FARNSWORTH

Reginald Hoffman Pettus (1920-2000)
John Wright Farnsworth (1941-1997)
Daniel Joseph Farnsworth (Of Counsel)

Daniel J. Farnsworth, Jr.*

*Member of the South Carolina and Virginia Bar

Attorneys and
Counselors at Law

211 Pettigru Street
Greenville, South Carolina 29601

201 King Street
Keysville, Virginia 23947

July 28, 2024

United States Postal Service and AIS Email

The South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Stephanie Chappell v. Johnny Mack Brown
Appellate Case Number: 2024-001071

Dear South Carolina Court of Appeals:

Please find enclosed Appellant's Motion for Extension to File Initial Brief and Designation of Matter in the above-referenced matter due to Mr. Farnsworth's excessive caseload.


I have enclosed six (6) copies of the Appellant's Motion for Extension to File Brief and Designation of Matter, along with the \$50.00 filing fee.

By copy of this letter, I am serving copies on all counsel of record.

With kind regards, I remain

Yours truly,

PETTUS / FARNSWORTH, LLC


Lauren O. Lipscomb
Senior Paralegal to
Daniel J. Farnsworth, Jr. (SC Bar 6922)

/lol

Enclosures

Cc: Russell W. Harter, Esquire (Via E-mail Only)

www.FarnsworthLawOffices.com

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Virginia Office 434.736.8171