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Aug 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, Appellant,

vs.

Johnny Mack Brown,.....Respondent.

SECOND 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 Stephanie Chappell moves for a Second 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 August 29, 2024. This is the second request for an extension filed by the Appellant.

Counsel plans to file a Motion to be Relieved, as Appellee has contacted counsel and requested to pick up her file. A thirty (30) day extension is to be requested in good faith to determine how counsel will move forward, this request will not cause any prejudice as Counsel for Respondent has been notified of this issue.

Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than Monday, September 30, 2024.

For these reasons, Appellant requests an extension of the deadline for filing and servicing the initial brief and Designation of Matter until September 30, 2024.

Dated this 29th day of August, 2024

PETTUS | FARNSWORTH, LLC

/s/ Daniel J. Farnsworth, Jr.
Daniel J. Farnsworth, Jr.
211 Pettigru Street
Greenville, SC 29601
Telephone: (864) 250-9119
Facsimile: (864) 250-9120
Dan@FarnsworthLawOffices.com



Lauren Lipscomb <lauren@farnsworthlawoffices.com>

Chappell

2 messages

Lauren Lipscomb <Lauren@farnsworthlawoffices.com>

Wed, Aug 28, 2024 at 2:32 PM

To: Russell Harter <rwjhr@chhlaw.net>, Dan Farnsworth <Dan@farnsworthlawoffices.com>, Patty Sanders <psanders@chhlaw.net>, Shelby Flagg <Shelby@farnsworthlawoffices.com>

Rusty and Patty-

I hope you are well. Dan wanted me to reach out. Our client came in and said she wanted to terminate Dan and wanted her file, and we have advised her that an appeal is pending. Dan is in his third day of a trafficking case in Greenville General Sessions. We also have a separate appellate brief due tonight as well.

How do you suggest we move forward till we can work this situation out with our client? We are unsure on how to proceed. My communication with Dan is limited currently due to him being in trial.

Also, would you approve another 30 day extension for the reasons above?

Best,

Lauren

--

Lauren O. Lipscomb
Firm Manager and Senior Litigation Paralegal to
Daniel J. Farnsworth, Jr.
Pettus | Farnsworth, LLC
211 Pettigru Street (29601)
Post Office Box 8719 (29604)
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INJURY LAW and WRONGFUL DEATH
NURSING HOME ABUSE

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and BUSINESS LITIGATION

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Russell Harter <rw hjr@chhlaw.net>

Wed, Aug 28, 2024 at 2:40 PM

To: Lauren Lipscomb <Lauren@farnsworthlawoffices.com>

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

Well, how to proceed will have to be Dans call not mine. When is your filing due in this case? Is it today? if you decide to file for an extension, it would seemingly be appropriate to have other counsel substituted at that time.? if there is a substitution of counsel and /or if Dan is withdrawing, I would not oppose an additional extension and consent under terms as the Appellate court may allow... Hope this answers your question. Please call my cell if you need clarification or any other information. Thank you.

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 Aug 28, 2024, at 2:32 PM, Lauren Lipscomb <Lauren@farnsworthlawoffices.com> wrote:

[Quoted text hidden]

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SC Court of Appeals

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, docs 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 29th day of August, 2024.

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

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

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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

/s/ Lauren O. Lipscomb

Lauren O. Lipscomb

Senior Paralegal to

Daniel J. Farnsworth, Jr.

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m

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

August 29, 2024

United States Postal Service and AIS Email
The South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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Aug 29 2024

SC Court of Appeals

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

Dear South Carolina Court of Appeals:

Please find enclosed Appellant's Second Motion for Extension to File Initial Brief and Designation of Matter in the above-referenced matter due to Appellant terminating Counsel

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

/s/ Lauren O. Lipscomb

Lauren O. Lipscomb

Senior Paralegal to

Daniel J. Farnsworth, Jr. (SC Bar 6922)

Enclosures

DFJ//lol

Cc: Russell W. Harter, Esquire (via Email only)