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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
COURT OF COMMON PLEAS

James E. Chellis, Master in Equity

APPELLATE CASE NO. 2024-000863

Vanessa Marie Frierson APPELLANT,

vs.

Judy A. Bloodworth, as sole beneficiary and as personal representative of the Estate of Jean Garris White, Debra Morse, Jackie McCoy, Christina Fightmaster, and John Doe and Mary Roe, fictitious names which represent any unknown heirs at law, devisees, widowers, executors, administrators, personal representatives, creditors, successors and assigns, firms or corporations of Jean Garris White (deceased), Junior Arch White (deceased), and any other unknown persons claiming any right, title, estate, or lien upon the real estate which is the subject of this action
RESPONDENTS.

MOTION TO FILE THE INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER OUTSIDE OF TIME

Counsel for Appellant Vanessa Marie Frierson respectfully requests leave to file the Initial Brief of Appellant and Designation of Matter outside of time, and in support of this request, counsel shows:

1. Counsel filed the Notice of Appeal in the above referenced case on May 28, 2024. The Initial Brief of Appellant and Designation of Matter was due to be filed on September 11, 2024.

2. Counsel for the Appellant accepted full time employment outside of the active practice of law in 2019, with the intent of closing the Vitollo Law Firm, and has had such full time employment outside of the active practice of law since that time. This matter is the only remaining open client file for Appellant's counsel, and counsel has sought to obtain substitute counsel for this matter without success.

3. This matter involves issues related to the Clementa C. Pinckney Uniform Partition of Heirs' Property Act, relatively new legislation, and will require the consideration and resolution of issues that will likely be of first impression for the Court of Appeals. Counsel has worked diligently outside of work hours to prepare the required filings, and counsel desire for additional time is requested to be able to prepare thorough, thoughtful and appropriately researched work product, and not for purposes of delay.

4. Counsel is requesting leave to file the required filings only 1 day past the established due date, and counsel's Initial Brief of Appellant and Designation of Matter is being filed with this motion.

WHEREFORE, the undersigned would respectfully request leave to file the Initial Brief of Appellant and Designation of Matter one day outside of time.

Respectfully submitted,

Spokane
August 12, 2024
TJV



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