

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Roger M. Young, Sr., Presiding Judge

Appellate Case No. 2024-001098

Taylor Brunson, ..... Respondent,

v.

Taylor Brunson, Respondent, v. Zack L. Evans, deceased, and any children and heirs at law, distributees and devisees, and if any be deceased then any persons entitled to claim under or through them; also all other persons unknown claiming any right, title, interest, or lien herein, any unknown adults being a class designated as John Doe; and any other unknown minors or persons under disability or in the military service being a class designated as Richard Roe, Tina L. Evans individually and as Personal Representative of the Estate of Zack L. Evans, Kara Pitchford, and Autumn Skye Properties, LLC, ..... Defendants,

of whom Tina L. Evans individually and as Personal Representative of the Estate of Zack L. Evans, and Kara Pitchford are the ..... Appellants.

**APPELLANTS' MOTION FOR AN  
EXTENSION OF TIME TO FILE INITIAL BRIEF  
AND DESIGNATION OF MATTER**

Appellants Tina L. Evans, individually and as Personal Representative of the Estate of Zack L. Evans, and Kara Pitchford, respectfully move this Court for an extension of time to file and serve their Initial Brief and Designation of Matter.

The Appellants' motion is based on the grounds that Counsel for Appellants requires additional time to prepare the Initial Brief and Designation of Matter due to a very active caseload

and scheduled court dates and would respectfully request an additional thirty (30) days to complete, file and serve these pleadings. This is the first request for an extension in this matter.

WHEREFORE, the Appellants respectfully request that they be granted an additional thirty (30) days to file their Initial Brief and Designation of Matter.

Respectfully submitted,

s/James Edward Bradley  
James Edward Bradley, SC Bar #66130  
Moore Bradley Myers Law Firm, PA  
1700 Sunset Blvd. (29169)  
PO Box 5709  
West Columbia, SC 29171  
803-796-9160  
Ward@mbmlawsc.com  
*Attorney for Appellants*

West Columbia, South Carolina  
September 16, 2024

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Sep 16 2024

SC Court of Appeals

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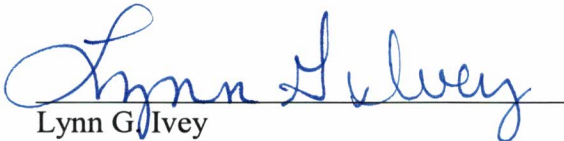
Taylor Brunson, Respondent, v. Zack L. Evans, deceased, and any children and heirs at law, distributees and devisees, and if any be deceased then any persons entitled to claim under or through them; also all other persons unknown claiming any right, title, interest, or lien herein, any unknown adults being a class designated as John Doe; and any other unknown minors or persons under disability or in the military service being a class designated as Richard Roe, Tina L. Evans individually and as Personal Representative of the Estate of Zack L. Evans, Kara Pitchford, and Autumn Skye Properties, LLC, ..... Defendants,

of whom Tina L. Evans individually and as Personal Representative of the Estate of Zack L. Evans, and Kara Pitchford are the ..... Appellants.

**PROOF OF SERVICE**

I, Lynn G. Ivey, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the Appellants' Motion for an Extension of Time to File Initial Brief and Designation of Matter by depositing a copy of same in the United States Mail, postage prepaid, on September 16, 2024, and via email addressed to its attorney of record as follows:

Stephanie Trotter Kellahan, Esq.  
D. Ryan McCabe, Esq.  
McCabe Trotter & Beverly, PC  
4500 Fort Jackson Blvd., Ste. 335  
Columbia, SC 29209  
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Lynn G. Ivey



S. Jahue Moore†  
James Edward Bradley†  
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William H. Edwards  
S. Jahue Moore, Jr.  
William B. Fortino  
Ralph Nichols Riley, Jr.  
John C. Bradley, Jr.  
Lester McGill Bell, Jr.

September 16, 2024

Melissa K. Moore  
Sierra D. Carini  
Emily E. Collins  
Erin R. Conroy  
Catherine Liscusky Jumper

*Retired*  
J. Mark Taylor\*\*  
C. David Sawyer, Jr.†  
Billy C. Coleman (1916-2019)  
Stanley L. Myers†\* (1976-2023)  
Robert D. Hazel† (1936-2024)

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
Via Email and US Mail ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))

Re: Taylor Brunson vs. Zack L. Evans, et al  
Appellate Case No. 2024-001098

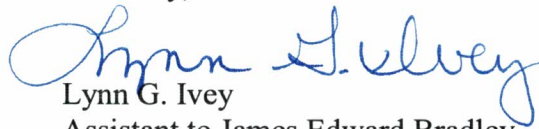
**RECEIVED**  
**Sep 16 2024**  
**SC Court of Appeals**

Dear Ms. Kitchings:

I hope you are well. Please find enclosed our firm check #75995 in the amount of \$50.00 for the filing fee for our motion for an extension of time filed today in this matter via email.

Please let our office know any questions or concerns. Should anything further be needed, we will be happy to provide. Thank you for your assistance with this matter.

Sincerely,

  
Lynn G. Ivey  
Assistant to James Edward Bradley

Enclosure

cc: Stephanie Trotter Kellahan, Esq. (via email)  
D. Ryan McCabe, Esq. (via email)