

**RECEIVED**

**Sep 16 2024**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
CIRCUIT COURT

George M. McFadden, Jr., Circuit Court Judge

Estate Case No. 2020-ES-40-00392  
Case No. 2023-cp-40-00573  
Appellate Case No. 2024-000234

Adrian E. Adams, as Personal Representative for the Estate of Adell T. Adams,  
.....Respondent,

v.

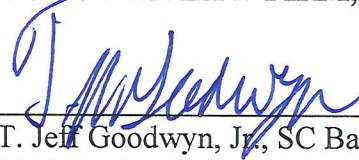
Constance Washington,.....Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S RECORD ON  
APPEAL**

Appellant hereby moves for an additional thirty (30) days in which to file its Record on Appeal that is currently due September 15, 2024 (Sunday). If the extension is granted, the Record on Appeal will be due on October 16, 2024. This motion is based on the relative complexity of the issues on appeal that are involved in this case and accumulating numerous documents to include in the appeal.

\*\*\*SIGNATURE TO FOLLOW ON NEXT PAGE\*\*\*

**GOODWYN LAW FIRM, LLC**



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*Attorney for Appellant*

Columbia, South Carolina  
September 16, 2024

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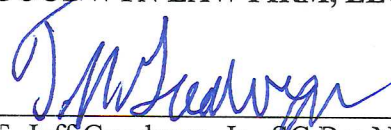
**PROOF OF SERVICE**

I certify that I have served a copy of **Appellant’s Motion for Extension of Time to File Record on Appeal**, upon; the following, at the address(es) below by E-mailing a copy of same, on September 16, 2024.

Soraya Martial-Wright, Esquire  
The Autonomy Group, PC  
452 Lakeshore Pkwy, Suite 120  
Rock Hill, SC 29730  
[soraya@taglegacyplanning.com](mailto:soraya@taglegacyplanning.com)

\*\*\*SIGNATURE TO FOLLOW ON NEXT PAGE\*\*\*

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*Attorney for Appellant*

Columbia, South Carolina  
September 16, 2024

T. Jeff Goodwyn, Jr.\*†  
Charles G. Blackburn\*\*  
Jefferson D. Turnipseed\*\*

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\*Also Licensed in Georgia  
† Certified Circuit Court Mediator  
\*\* Of Counsel

September 16, 2024

**VIA E-FILING – Ctappfilings@sccourts.org**  
The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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

RE: *Constance Washington v Adrian E Adams, as Personal Representative for the Estate of Adell T Adams*  
*Civil Action No.: 2023-CP-40-00573*  
*Estate Case No.: 2020-ES-40-00392*  
*Appellate Case No.: 2024-000234*  
*Our File No.: 3000-0137*

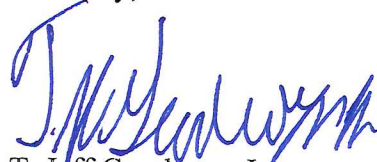
Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of Appellant's Motion for Extension of Time to File Record on Appeal, along with a Proof of Service, in regards to the above referenced matter. Please file the original and return a filed copy of same to me via email. Additionally, please find a copy of the \$50.00 filing fee, which has been placed in today's mail.

As evidenced in the Proof of Service, I have served all interested parties, with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,

  
T. Jeff Goodwyn, Jr.

TJG:cnc  
Enclosures  
cc: Soraya Martial-Wright, Esquire (via email)