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**Sep 25 2024**

**SC Court of Appeals**

**IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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**APPEAL FROM CHARLESTON COUNTY  
MIKELL R. SCARBOROUGH, MASTER-IN-EQUITY**

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**Appellate Case No. 2024-000947  
Lower Case No. 2021-CP-10-04257**

Vicki Lynn Vergeldt, individually, and as Successor Trustee  
of the John Vergeldt, Jr. Revocable Living Trust dated  
September 27,1978..... Respondent,

v.

John Edward Vergeldt and Teresa Shaw-Vergeldt, Defendants  
of whom John Edward Vergeldt is the .....Appellant.

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT VICKI LYNN  
VERGELDT, INDIVIDUALLY, AND AS SUCCESSOR TRUSTEE OF THE JOHN  
VERGELDT, JR. REVOCABLE LIVING TRUST DATED SEPTEMBER 27,1978'S  
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL**

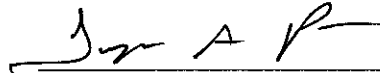
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Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27,1978 (“Respondent”), by and through her undersigned counsel respectfully requests a 30 day extension of time, or until October 27, 2024 to file the Initial Brief of Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27,1978, as well as her Designation of Matter to be Included on Appeal, which is currently due on September 27, 2024. The request is based on counsel’s and his staff’s workload demands and other commitments as well as the pending tropical weather from Hurricane Helene and counsel’s children’s after school care cancellations.

Prior to filing this Motion, counsel for Respondent consulted with counsel for Appellant John Edward Vergeldt, and she consented to the requested extension.

Respectfully submitted,

HARRELL, MARTIN & PEACE, P.A.



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Taylor A. Peace (S.C. Bar No. 100206)  
135 Columbia Ave. (Physical Address)  
P.O. Box 1000 (Mailing Address)  
Chapin, South Carolina 29036  
Phone: (803) 345-3353

*Attorney for Respondent Vicki Lynn Vergeldt,  
individually, and as Successor Trustee of the John  
Vergeldt, Jr. Revocable Living Trust dated  
September 27, 1978*

September 25, 2024  
Chapin, South Carolina

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of the John Vergeldt, Jr. Revocable Living Trust dated  
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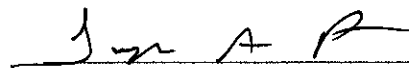
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PROOF OF SERVICE

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I hereby certify that I have served a copy of the **Motion For Extension Of Time To File Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27, 1978's Initial Brief and Designation Of Matter to be Included on Appeal** in the above referenced case has been served on September 25, 2024, on the following by causing a copy to be delivered via electronic mail and the U.S. Postal Service to Counsel to the addresses shown below:

Desa Ballard, Esq.  
Haley A. Hubbard, Esq.  
BALLARD & WATSON  
P.O. Box 6338  
West Columbia, SC 29171

  
Taylor A. Peace (S.C. Bar No. 100206)  
Harrell, Martin & Peace, P.A.  
135 Columbia Ave. (Physical Address)  
P.O. Box 1000 (Mailing Address)  
Phone: (803) 345-3353  
*Attorney for Respondent Vicki Lynn Vergeldt,  
individually, and as Successor Trustee of the  
John Vergeldt, Jr. Revocable Living Trust  
dated September 27,1978*

**HMP** HARRELL, MARTIN  
& PEACE, P.A.  
ATTORNEYS AT LAW

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L.K. "Trey" Harrell, III  
Jeremy C. Martin  
M. Alan Peace \*\*  
Taylor A. Peace  
Erik T. Norton  
Jamie A. Weller

Robert W. Dibble, Jr. \*  
William Jennings (Bill) Buchanan \*  
Donald W. Tyler \*  
Thomas B. Jackson, III \*

\*Of Counsel  
\*\*Certified Mediator/Arbitrator

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September 25, 2024

**VIA EMAIL (ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: **Vicki Lynn Vergeldt, et al. v. John Edward Vergeldt and Teresa Shaw-Vergeldt**  
Appellate Case No.: 2024-000947  
Case No. 2021-CP-10-04257  
Our File No.: 3490.00001

Dear Ms. Kitchings:

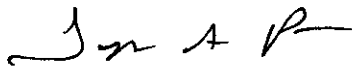
Our law firm represents the Respondent, Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27, 1978, in the above referenced matter. Enclosed please find the Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27, 1978's Motion for Extension of Time to file Respondent's Initial Brief and Designation of Matter to be Included on Appeal. Also enclosed is our firm's check in the amount of \$50.00 for the filing fee. Please file the originals and return a clocked copy to me in the self-addressed envelope provided.

By copy of this letter, I am serving counsel of record with a copy of the same.

Thank you for your assistance with this matter.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.



Taylor A. Peace, Esquire

TAP/tsm

Enclosures

cc: Desa Ballard, Esq. and Haley A. Hubbard, Esq. – via email only