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Oct 14 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 October 16, 2024 pursuant to the September 30, 2024 Supreme Court Order pursuant to Rule 611, SCACR. If the extension is granted, the Record on Appeal will be due on November 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 and the time away from the office in the wake of Hurricane Helene.

SIGNATURE TO FOLLOW ON NEXT PAGE

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr., SC Bar No. 73789

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Attorney for Appellant

Columbia, South Carolina
October 14, 2024

The Supreme Court of South Carolina

RE: Hurricane Helene and the Computation of Time--
Extension of Prior Order

ORDER

On September 30, 2024, this Court issued an Order pursuant to Rule 611 of the South Carolina Appellate Court Rules, (SCACR) declaring filing "holidays" for Friday September 27; Monday September 30; and Tuesday, October 1, 2024 because of issues caused by Hurricane Helene. Based on the continued difficulties in restoring power and other services to large portions of the population in South Carolina, we find these problems continue to adversely affect the ability of many lawyers and litigants to comply with filing and service deadlines in various courts.

Accordingly, we declare Wednesday October 2 through Friday October 4, 2024 to be statewide filing "holidays" for the purpose of computing time under Rule 263 of the South Carolina Appellate Court Rules; Rule 6 of the South Carolina Rules of Civil Procedure; Rule 35 of the South Carolina Rules of Criminal Procedure; and Rule 3 of the South Carolina Rules of Magistrates Court.

The Supreme Court will evaluate conditions to determine whether the filing holidays declared in this order should be further extended. A copy of this order shall be provided to the Chairs of the House and Senate Judiciary Committees in accordance with Rule 611, SCACR.

s/ John W. Kittredge C.J.

s/ John Cannon Few J.

s/ George C. James, Jr. J.

s/ D. Garrison Hill J.

s/ Letitia H. Verdin J.

Columbia, South Carolina
October 1, 2024

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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.

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 October 14, 2024.

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

SIGNATURE TO FOLLOW ON NEXT PAGE

GOODWYN LAW FIRM, LLC

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Columbia, South Carolina
October 14, 2024

T. Jeff Goodwyn, Jr.*†
Charles G. Blackburn**
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† Certified Circuit Court Mediator
** Of Counsel

October 11, 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

RECEIVED
Oct 14 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

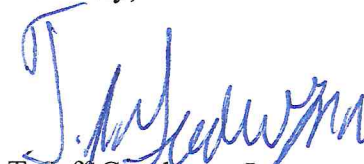
Dear Ms. Kitchings:

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)