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**Oct 14 2024**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
CIRCUIT COURT

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-20-00104  
Appellate Case No.: 2023-001451

Bertha Goins,.....Respondent,

v.

Jenkinsville Water Co., Inc.,.....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

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## ORDER

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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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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
CIRCUIT COURT

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-20-00104  
Appellate Case No.: 2023-001451

Bertha Goins,.....Respondent,

v.

Jenkinsville Water Co., Inc.,.....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; Austin T. Reed, Esquire; Daniel C. Plyler, Esquire; Sydney J. Douglas, Esquire and H. Thomas Morgan, Jr., Esquire, Attorneys for Respondent, at the address(es) below by E-mailing a copy of same, on October 14, 2024.

Sydney J. Douglas, Esquire  
Austin T. Reed, Esquire  
Daniel C. Plyler, Esquire  
Smith Robinson, LLC  
2530 Devine Street  
Columbia, SC 29205  
[sydney.douglas@smithrobinsonlaw.com](mailto:sydney.douglas@smithrobinsonlaw.com)  
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\*\*\*SIGNATURE TO FOLLOW ON NEXT PAGE\*\*\*

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*Attorney for Appellant*

Columbia, South Carolina  
October 14, 2024

T. Jeff Goodwyn, Jr.\*†  
Charles G. Blackburn\*\*  
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\*Also Licensed in Georgia  
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\*\* 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: ***Bertha Goins v. Jenkinsville Water Company, Inc.***  
*Civil Action No.: 2022-CP-20-00104*  
*Appellate Case No.: 2023-001451*  
*Our File No.: 3550-0001*

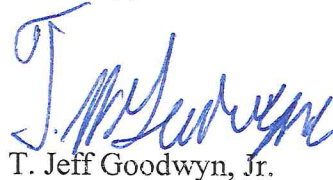
Dear Ms. Kitchings:

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: Austin T. Reed, Esquire  
Daniel C. Plyler, Esquire  
Sydney J. Douglas, Esquire  
H. Thomas Morgan, Jr., Esquire  
(all via email)