

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

James E. Chellis, Master in Equity

Appellate Case No. 2024-000863

Vanessa Marie Frierson, Appellant,

v.

Judy A. Bloodworth, as sole beneficiary and as personal representative of the Estate of Jean Garris White, Debra Morse, Jackie McCoy, Christina Fightmaster, and John Doe and Mary Roe, fictitious names which represent any unknown heirs at law, devisees, widowers, executors, administrators, personal representatives, creditors, successors and assigns, firms or corporations of Jean Garris White (deceased), Junior Arch White (deceased), and any other unknown persons claiming any right, title, estate, or lien upon the real estate, which is the subject of this action, Respondents.

**MOTION FOR PERMISSION TO SERVE
AND FILE OUTSIDE OF TIME AND FOR EXTENSION
OF TIME TO FILE AND SERVE INITIAL BRIEF
AND DESIGNATION OF MATTER OF RESPONDENT**

I, the undersigned counsel for Respondent, Judy A. Bloodworth, pursuant to Rule 240, SCACR, hereby move for permission to serve and file the Initial Brief of Respondent and Designation of Matter, and concurrently to file and serve the same out of time per correspondence and directive of the Court dated November 1, 2024. Counsel seeks such leave on the basis Counsel's recent and ongoing trial schedules, general practice workload, and personal obligations have consumed significant time and resources, resulting in Counsel's inability to finalize quality briefing and work product for the Court's consideration within the appellate deadlines. Pursuant to the Court's Order entered October 1, 2024, Respondent's Initial Brief and Designation of Matter was due November 1, 2024. Counsel respectfully requests leave to file and serve the same on or before December 1, 2024, said date representing thirty (30) days from the date the filings were initially due.

Respectfully submitted,

/s/ Andrew T. Shepherd

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S.C. Bar No.: 76859

Attorney for Respondent Judy Bloodworth

November 15, 2024

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SC Court of Appeals

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PROOF OF SERVICE

I certify that I have served the Respondent's Motion to Serve and File Out of Time and for Extension of Time and the within Proof of Service on Vanessa Marie Frierson via e-mail, on November 15, 2024, addressed to her attorney of record, Timothy Vitollo, at tim@vitollolawfirm.com and upon other parties below, by depositing a copy of it in the United States Mail, postage prepaid, on the date shown below, addressed to such parties as follows:

Jackie McCoy
251 Barrett Road
Heath Springs, SC 29058

Debra Morse
17815 Westbever Street
Jacksonville, FL 32234

Christina Fightmaster
1217 Charleston Court
Florence, KY 41042

Respectfully submitted,

/s/ Andrew T. Shepherd

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November 15, 2024