

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

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**APPEAL FROM LEE COUNTY**

**Richard L. Hinson, Special Referee  
SC Bar # 15082**

**Appellate Case No. 2024-001025**

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<b>Carroll D. Brown,</b>	)	
	)	
<b>Appellant,</b>	)	
	)	
<b>versus</b>	)	<b>Motion for Extension of Time Pursuant</b>
	)	<b>to Rule 240 of the Appellate Court Rules</b>
<b>John M. Baker dba Humpty Dumpty,</b>	)	
<b>Mobile Home Park and Dream Home</b>	)	
<b>Properties, LLC,</b>	)	
	)	
<b>Respondents.</b>	)	
	)	

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The Appellant, Carroll D. Brown, hereby moves for an extension of time of thirty additional days to file its initial brief and Designation of Matters to be included on Appeal. Appellant received the transcript of the hearing on November 12, 2024. The initial brief and Designation of Matter would be due on December 12, 2024.

If an extension of time is granted, Appellant's brief would be due on January 13, 2025.

Appellant's attorney states that his paralegal left without giving two weeks notice and left much unfinished work to be done. Appellant's attorney is woefully behind and has been unable to retain another experienced paralegal. Appellant's attorney has hired a new secretary who has no legal experience. Appellant's attorney is attempting to train his new secretary while

attempting to manage his case load. Appellant's attorney states he cannot meet the current deadline of December 12, 2024, and respectfully moves for a thirty day extension of time.

Dated this 4<sup>th</sup> day of December, 2024

s/John W. Bledsoe, III  
John W. Bledsoe, III  
Bledsoe Law Firm  
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Attorney for Appellant

Other Counsel of Record:  
Kevin Barth  
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843-623-6301  
Attorney for Respondent

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Dec 04 2024

SC Court of Appeals

Carroll D. Brown, )  
 )  
 Appellant, )  
 )  
 versus )  
 )  
 John M. Baker dba Humpty Dumpty, )  
 Mobile Home Park and Dream Home )  
 Properties, LLC, )  
 )  
 Respondents. )  
 )  
 \_\_\_\_\_ )

Affidavit of John W. Bledsoe, III

After being duly sworn, the affiant states as follows:

I am the attorney for the Appellant. Recently, my paralegal left without allowing me two weeks notice and left much unfinished work. I have been unable to find an experienced paralegal to replace the one that left. I have just hired a secretary, a young lady who has no secretarial or legal experience. I am struggling to train her and maintain my caseload. I am woefully behind. I cannot meet the current deadline of December 12, 2024 to file the initial brief and Designation of Matter. I am asking the Court to grant me an additional thirty days, until January 13, 2025, to file my brief and Designation of Matter.



John W. Bledsoe, III

Sworn to before me before this 4  
 day of December, 2024.

Rebecca Rubatom  
 Notary Public for South Carolina  
 My Commission Expires: 1-12-26

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**Dec 04 2024**

**SC Court of Appeals**

**Carroll D. Brown,** )  
)  
**Appellant,** )  
)  
**versus** )  
)  
**John M. Baker dba Humpty Dumpty,** )  
**Mobile Home Park and Dream Home** )  
**Properties, LLC,** )  
)  
**Respondents.** )  
\_\_\_\_\_ )

**Certificate of Service**

**Case No.: 2024-001025**

I certify that on December 4, 2024, I served a copy of a Motion for Extension of Time Pursuant to Rule 240 of the Appellate Court Rules, dated December 4, 2024, via email at the email address indicated below:

Kevin Barth  
[Kbarth@bbllawsc.com](mailto:Kbarth@bbllawsc.com)  
Attorney for Respondent

s/John W. Bledsoe, III  
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Attorney for Appellant