

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. Counsel seeks such leave on the basis Counsel's initial briefing deadline expired over the Christmas Holidays, of which the Court requested filing of the same on or before today's date, together with the requisite motion. However, counsel has been unable to fully complete the Respondent's brief in the period prior to and following return to the office after the holidays, and requires a small additional window of time to complete the initial brief as requested. Counsel respectfully requests extension and leave to file and serve the same, out of time, on or before February 3, 2025. Counsel asserts no additional time beyond that day will be necessary or requested.

Respectfully submitted,

/s/ Andrew T. Shepherd

Andrew T. Shepherd

Shepherd Law Firm, LLC

204 Brighton Park Blvd., Suite B

Summerville, SC 29486

(843) 900-3575

(843) 800-8415 fax

andrew@sheplawfirm.com

S.C. Bar No.: 76859

Attorney for Respondent Judy Bloodworth

January 21, 2025

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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 January 21, 2025, 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

Andrew T. Shepherd
Shepherd Law Firm, LLC
204 Brighton Park Blvd., Suite B
Summerville, SC 29486

(843) 900-3575

(843) 800-8415 fax

andrew@sheplawfirm.com

S.C. Bar No.: 76859

Attorney for Respondent Judy Bloodworth

January 21, 2025