

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas  
George M. McFaddin, Jr., Circuit Court Judge

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Appellate Case No. 2024-001681

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Kimberly Welch, as Personal Representative of the  
Estate of Judy Ann Haselden,..... Respondent,

v.

Michael D. Smoak and Murray Sand Co., Inc.,..... Appellants.

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**MOTION FOR EXTENSION**

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Respondent Kimberly Welch, as Personal Representative of the Estate of Judy Ann Haselden, respectfully requests a thirty (30) day extension of time to file her Initial Brief and Designation of Matter, which are currently due on or before February 3, 2025. This is Respondent’s first request for an extension of these deadlines. Respondent requests the extension based on her counsel’s work obligations in other matters. If the Court grants the requested extension, the new deadline for Respondent’s Initial Brief and Designation of Matter will be March 5, 2025.

*[Signature page to follow]*

Respectfully submitted,

**SMITH ROBINSON HOLLER  
DUBOSE AND MORGAN, LLC**

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*Attorneys for Respondent*

Sumter, South Carolina

January 29, 2025

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**PROOF OF SERVICE**

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I, the undersigned employee of Smith Robinson Holler DuBose and Morgan, LLC, certify that a true copy of Respondent Kimberly Welch, as Personal Representative of the Estate of Judy Ann Haselden’s Motion for Extension in this case has been served on the following, this 29<sup>th</sup> of January, 2025, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the May 6, 2022 Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447).

Jeffrey T. Ammons, Esquire  
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Jennifer Lisandrelli

January 29, 2025

Reply To: Columbia  
fred.hanna@smithrobinsonlaw.com

January 29, 2025

**Via Email**

Ms. Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**  
**Jan 29 2025**  
**SC Court of Appeals**

RE: Kimberly Welch, as Personal Representative of the Estate of Judy Ann Haselden,  
Respondent v. Michael D. Smoak and Murray Sand Co., Inc., Appellants  
Appellate Case No.: 2024-001681  
SR File No.: 0100-0022

Dear Ms. Kitchings:

Please find enclosed a Motion for Extension filed by Respondent Kimberly Welch, as Personal Representative of the Estate of Judy Ann Haselden, for filing with your office. The \$50.00 motion fee check will be hand delivered to the Court under separate cover.

Very truly yours,



Frederick N. Hanna, Jr.

FNHjr/jll  
Enclosures

cc: Jeffrey T. Ammons, Esquire  
Sarah Rand-McDaniel, Esquire  
S. Wallace Carnwath, III, Esquire  
Andrew F. Lindemann, Esquire  
E. Hood Temple, Esquire  
Alexander S. Hogsette, Esquire