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Mar 05 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Walton J. McLeod, Circuit Court Judge
Case No. 2020-CP-32-01941

Appellate Case No. 2024-001801

Joseph R. Dawson, Jr., Plaintiff/Appellant

v.

Heather Pounds, Individually, as Agent under Power of Attorney, and as Personal Representative of the Estate of Jane Rollins Dawson, Defendant/Respondent.

MOTION FOR EXTENSION TO SERVE AND FILE RESPONDENT'S INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 240, SCACR, respondent Heather Pounds, Individually, as Agent under Power of Attorney, and as Personal Representative of the Estate of Jane Rollins Dawson, ("Pounds") moves for an extension of time in which to serve and file respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal ("Designation of Matter"). Pounds requests an extension of fourteen days to file the Initial Brief and Designation of Matter which are currently due March 7, 2025. This is the first request for an extension filed by Pounds. The grounds for this motion are that other impending personal and professional matters and obligations have created a need for additional time to prepare the respondent's Initial Brief and Designation of Matter. A fourteen-day delay will not prejudice the rights of any of the parties. Appellant's counsel has affirmatively indicated that he does not object to this motion. Granting

this motion would require the respondent's Initial Brief and Designation of Matter to be filed with the Court no later than March 21, 2025.

For these reasons, Pounds requests an extension of the deadline for filing and serving respondent's Initial Brief and Designation of Matter until March 21, 2025.

Respectfully submitted this 5th day of March, 2025.

POLALES HORTON & LEONARDI LLP

/s/ Shelby K. Leonardi

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PROOF OF SERVICE

Pursuant to Rule 262(c)(3), SCACR, undersigned counsel hereby certifies that a true copy of the Motion for Extension to Serve and File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced case has been served upon Adam Ruffin and Greg Parker, at the primary e-mail address listed for each of them in the Attorney Information System (AIS), this 5th day of March, 2025.

/s/ Shelby K. Leonardi

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Attorney for Respondent