

**RECEIVED**

**Jun 02 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas

G. Wells Dickson, Jr., Special Referee

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Appellate Case No. 2025-000064

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Gina M. Derry and Catherine M. Stone, Appellants

v.

Ray A. Zuber and Ellen R. Zuber, Respondents.

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**MOTION FOR EXTENSION OF TIME FOR RESPONDENTS TO SERVE AND FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

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Pursuant to Rule 240, SCACR, Respondents, Ray A. Zuber and Ellen R. Zuber, move for an extension of time in which to serve and file Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal ("Designation of Matter"). The Respondents request an extension of thirty (30) days to file the Initial Brief and Designation of Matter which are currently due June 3, 2025. This is the first request for an extension filed by the Respondents.

The grounds for this motion are that although a draft of the brief has been prepared, time demands have not allowed the appropriate time for editing and submission. A thirty (30) day delay will not prejudice the rights of any of the parties. The Respondents have notified counsel for the parties of the intent to file this Motion. Counsel for the Appellants, Mary P. Crawford,

Esquire, has affirmatively indicated that she has no objection. Granting this motion would require the Initial Brief and Designation of Matter of the Respondents to be filed with the Court no later than July 7, 2025.

For these reasons, the Respondents request an extension of the deadline for filing and serving the Initial Brief and Designation of Matter of the Respondents until July 7, 2025.

Dated this 2nd day of June, 2025.

JOHNSON | DURANT, LLC

By:



William H. Johnson, (SC Bar 15167)

PO Box 137

Manning, SC 29102

Telephone: 803-435-0909

Facsimile: 855-926-0923

Email: [william@jdnlawfirm.com](mailto:william@jdnlawfirm.com)

*Attorney for the Respondents*

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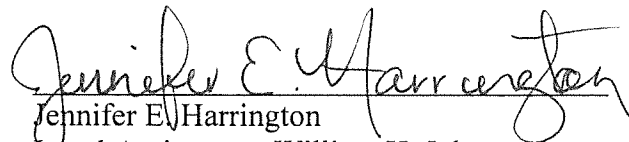
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**PROOF OF SERVICE**

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I, Jennifer E. Harrington, an employee of Johnson | DuRant, LLC, attorneys for the Respondents, Ray A. Zuber and Ellen R. Zuber, does hereby certify that I have served a copy of the **Motion for Extension of Time**, on **Mary P. Crawford, Esquire, Attorney for the Appellants, Gina M. Derry and Catherine M. Stone**, by emailing to [thecrawfordlawfirmllc@gmail.com](mailto:thecrawfordlawfirmllc@gmail.com) and by personally placing a copy of said document(s) in the United States Mail, first class postage prepaid, and addressed as follows, on June 2, 2025:

*Mary P. Crawford, Esquire  
The Crawford Law Firm, LLC  
PO Box 654  
Walterboro, SC 29488*



Jennifer E. Harrington  
Legal Assistant to William H. Johnson  
PO Box 137 – 411 N. Brooks Street  
Manning, SC 29102  
Telephone: 803-435-0909  
Facsimile: 855-926-0923

June 2, 2025  
Manning, SC

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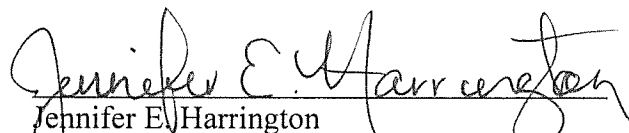
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**PROOF OF SERVICE**

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I, Jennifer E. Harrington, an employee of Johnson | DuRant, LLC, attorneys for the Respondents, Ray A. Zuber and Ellen R. Zuber, does hereby certify that I have served a copy of the **Motion for Extension of Time**, on **Mary P. Crawford, Esquire, Attorney for the Appellants, Gina M. Derry and Catherine M. Stone**, by emailing to [thecrawfordlawfirmllc@gmail.com](mailto:thecrawfordlawfirmllc@gmail.com) and by personally placing a copy of said document(s) in the United States Mail, first class postage prepaid, and addressed as follows, on June 2, 2025:

*Mary P. Crawford, Esquire  
The Crawford Law Firm, LLC  
PO Box 654  
Walterboro, SC 29488*



Jennifer E. Harrington  
Legal Assistant to William H. Johnson  
PO Box 137 – 411 N. Brooks Street  
Manning, SC 29102  
Telephone: 803-435-0909  
Facsimile: 855-926-0923

June 2, 2025  
Manning, SC

JOHNSON | DURANT, LLC  
ATTORNEYS AT LAW

---

William H. Johnson\*  
Christopher R. DuRant

\*Also licensed in North Carolina

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REPLY TO MANNING OFFICE

June 2, 2025

(Via Email: [thecrawfordlawfirmllc@gmail.com](mailto:thecrawfordlawfirmllc@gmail.com) and USPS Mail)

Mary P. Crawford, Esquire  
The Crawford Law Firm, LLC  
Post Office Box 654  
Walterboro, South Carolina 29488

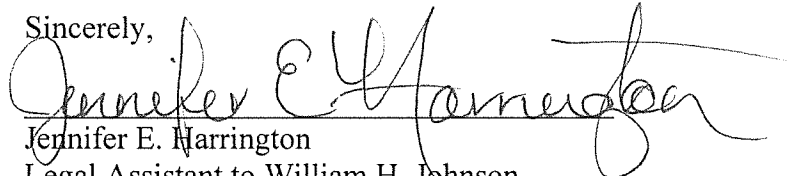
RE: Gina M. Derry and Catherine M. Stone v. Ray A. Zuber and Ellen R. Zuber  
Appellate Case No. 2025-000064  
Our File No. 16-411WM

Dear Ms. Crawford:

Enclosed herewith and served upon you, please find a copy of the **Motion for Extension of Time for Filing of Respondents' Initial Brief and Designation of Matter along with Proof of Service** in regard to the above captioned matter.

Thank you for your attention to this matter.

Sincerely,

  
Jennifer E. Harrington  
Legal Assistant to William H. Johnson

/jeh  
Enclosure(s)

# JOHNSON | DURANT, LLC

## ATTORNEYS AT LAW

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William H. Johnson\*  
Christopher R. DuRant

\*Also licensed in North Carolina

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REPLY TO MANNING OFFICE

June 2, 2025

(Via Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org) and USPS Mail *(filing fee check only)*)

The Honorable Jenny A. Kitchings  
The SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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**SC Court of Appeals**

RE: Gina M. Derry and Catherine M. Stone v. Ray A. Zuber and Ellen R. Zuber  
Appellate Case No. 2025-000064  
Our File No. 16-411WM

Dear Ms. Kitchings:

Enclosed herewith for filing, please find the Motion for Extension of Time for Filing of Respondents' Initial Brief and Designation of Matter along with Proof of Service in regard to the above captioned matter.

Please be advised that our firm's check no. 13269 made payable to your office in the amount of \$50.00 for the Motion filing fee is being placed in the mail to your office this afternoon via USPS First Class Mail. By copy of this correspondence and enclosures to Ms. Crawford, we are noticing her of same.

Thank you for your attention to this matter.

Sincerely,



William H. Johnson

WHJ/jeh  
Enclosure(s)

cc: Mary P. Crawford, Esquire (Via Email: [thecrawfordlawfirmllc@gmail.com](mailto:thecrawfordlawfirmllc@gmail.com), w/ copy of Enclosures)