

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

Robert William Goodwin and Marian Charlene Goodwin. . . . Appellants,

v.

April Desiree Chappell, individually and as agent for
Swift Transportation Company of Arizona, LLC, and Swift
Transportation Company of Arizona, LLC, Respondents... . Respondents.

Case No.: 2025-000049

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, the Appellants respectfully request an extension of time for the serving and filing of the initial brief of the Appellants in the above referenced case. This Motion is based on the following:

The transcript was received by e-mail on June 19, 2025 at 1:30 P.M. Every lawyer in the Allen and Allen Law Firm (3) were out of the office the week of June 16 - 23 for annual vacations and the senior paralegal for the has been on extended medical leave (surgery) since June 11, 2025 and is not expected to return until July. Further, said transcript if approximately 1,100 pages with multiple exhibits and trial in the case lasted for more tan one week.

Pursuant to Rule 208 of the South Carolina Appellate Court Rules, the initial brief of the Appellant is due on July 19, 2025. Attorneys for the Appellants

respectfully request an extension of 60 days, which would make the Appellant's initial brief due on August 18, 2025.

ALLEN & ALLEN LAW FIRM, LLC

A handwritten signature in black ink, appearing to read "Donald L. Chuck Allen", written over a horizontal line.

Donald L. Chuck Allen, JD, SC Bar#10421

Joshua C. B. Allen, JD, SC Bar #80398

Austin G. McLain, JC, SC Bar#100692

Attorneys for Appellants

PO Box 2861

Anderson, SC 29622

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Jun 25 2025

SC Court of Appeals

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on April Desiree Chappell, individually and as agent for Swift Transportation Company of Arizona, LLC, and Swift Transportation Company of Arizona, LLC, on the below named attorney for the Respondents by electronic mail to the address provided by the Respondents' attorney on the 25th day of June, 2025 addressed as follows:

Mark Steven Barrow
Sweeny Wingate & Barrow, P.A.
PO BOX 12129
Columbia, SC 29211
msb@swblaw.com

ALLEN & ALLEN LAW FIRM, LLC



Donald L. Chuck Allen, JD, SC Bar#10421
Joshua C. B. Allen, JD, SC Bar #80398
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Anderson, SC 29622
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ALLEN & ALLEN
LAW FIRM, LLC

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Jun 25 2025

SC Court of Appeals

Donald L. "Chuck" Allen
Sr. Managing Partner

Joshua C.B. Allen
Partner

June 25, 2025

Austin G. McLain
Jr. Partner

****U.S. Mail & E-Mail**** ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO BOX 11629
Columbia, SC 29211

RE: Robert William Goodwin and Marian Charlene Goodwin v. April Desiree Chappell, individually and as agent of Swift Transportation Company of Arizona, LLC, and Swift Transportation Company of Arizona, LLC.
Case No.: 2021-CP-04-00234

Dear Ms. Kitchings,

Enclosed for filing is a Motion for Extension of Time for serving and filing of the initial brief of the Appellants in the above case. Also enclosed are the following:

- (1). Proof of service of the Motion for Extension of Time on the Respondents, and
- (2). A filing fee of \$50.00.

Thank you for your assistance in this matter.

Sincerely,

ALLEN & ALLEN LAW FIRM, LLC

Donald L. Chuck Allen, JD, SC Bar #10421
PO Box 2861
Anderson, SC 29622
(864)226-6184
Attorney for Appellants

DCA/rs

Enclosures

xc: Mark Steven Barrow, Esq.
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Attorney for Respondents