

**RECEIVED**

**Jun 25 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

Appeal from Richland County  
Court of Common Pleas

---

Patrick C. Fant, III, Circuit Court Judge

---

Appellate Case No. 2025-000614  
Civil Action No. 2024-CP-40-00827

---

Kellum W. Allen,.....Respondent,

v.

Ann Marie Watson,.....Appellant


---

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT, ANN MARIE WATSON’S,  
INITIAL BRIEF AND DESIGNATION OF MATTER

---

Appellant, Ann Marie Watson, by and through its undersigned counsel, respectfully requests an extension until July 27, 2025 to file her Initial Brief and Designation of Matter, which are currently due June 27, 2025.

There have been no previous requests for extension of this deadline. Counsel for Respondent has told me he does not oppose this motion.

  
\_\_\_\_\_  
Robert P. Wood, SC Bar No. 6206  
ROGERS TOWNSEND, LLC  
1221 Main Street, 14<sup>th</sup> Floor (29201)  
Post Office Box 100200  
Columbia, South Carolina 29202

(803) 771-7900  
Robert.Wood@RogersTownsend.com

Attorneys for the Appellant, Ann Marie Watson

June 25, 2025

## Melissa A. McQuade

---

**From:** Robert P. Wood  
**Sent:** Wednesday, June 25, 2025 3:53 PM  
**To:** randy@oldcourthouse.com; Nicole Price  
**Cc:** Melissa A. McQuade  
**Subject:** Allen v. Watson - Appellate Case No. 2025-000614 - Motion for Extension  
**Attachments:** Ltr to Clerk with Motion, Certif of Service, and \$50.Check.PDF

Randy, attached is our motion for a 30-day extension. As I recall, yesterday you stated you did not object to such a motion.

Bob



Robert P. Wood  
Member

Rogers Townsend LLC  
1221 Main Street 14th Floor  
Columbia, SC 29201

Direct 803.744.1275  
Fax 803.343.7017

Main 803.771.7900  
Cell 803.530.8921  
Visit [rogerstownsend.com](http://rogerstownsend.com)  
Admitted in SC  
and US Virgin Islands

---

**RECEIVED**

**Jun 25 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

Appeal from Richland County  
Court of Common Pleas

The Hon. Patrick C. Fant, III

Civil Action No. 2024-CP-40-00827

Kellum W. Allen, ..... Respondent,

v.

Ann Marie Watson, ..... Appellant

**PROOF OF SERVICE**

The undersigned counsel for Appellant hereby certifies, subject to penalty of perjury, that the following documents were served upon the following counsel of record by the following means on the date identified below.

Appellant's filing fee in connection with this appeal is being sent by U.S. Mail to the Office of the Clerk of the Court of Appeals, consistent with Supreme Court Order 2020-05-29-02.

Document: Motion for Extension of Time to File Appellant, Ann Marie Watson's, Initial Brief and Designation of Matter

Counsel Served: For Respondent, Kellum W. Allen  
James Randall Davis, Esq. (S.C. Bar No. 1580)  
Davis Frawley, LLC  
140 East Main Street (29072)  
Post Office Box 489  
Lexington, South Carolina 29071  
(803) 359-2512

[Randy@OldCourthouse.com](mailto:Randy@OldCourthouse.com)

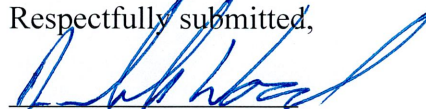
Means of Delivery: Via Email Only

Courts Served: Office of the Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Means of Delivery: Email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
Associated filing fee via U.S. Mail

Date: June 25, 2025.

Respectfully submitted,



Robert P. Wood, SC Bar No. 6206  
ROGERS TOWNSEND, LLC  
1221 Main Street, 14<sup>th</sup> Floor  
PO Box 100200 (29202)  
Columbia SC 29201  
(803) 771-7900 – Telephone  
(803) 343-7017 - Fax  
[robert.wood@rogerstownsend.com](mailto:robert.wood@rogerstownsend.com)

Attorney for Appellant, Ann Marie Watson

ROGERS TOWNSEND LLC  
POST OFFICE BOX 100200 (29202)  
1221 Main Street, 14th Floor  
COLUMBIA, SOUTH CAROLINA 29201  
P 803.771.7900 F 803.343.7017

Robert P. Wood  
ROBERT.WOOD@ROGERSTOWNSEND.COM  
P 803.744.1275  
C 803.530.8921  
LICENSED IN SC AND US VIRGIN ISLANDS



June 25, 2025

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Kellum W. Allen, Respondent v. Ann Marie Watson, Appellant  
Case No. 2025-000614

Dear Ms. Kitchings:

Enclosed, please find our check number 10126148 in the amount of \$50.00 to cover the associated filing fee for Appellant's Motion to Extend Time to File Initial Reply Brief and Designation of Matter on behalf of the Appellant, Ann Marie Watson, with proof of service.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. P. Wood", is written over a horizontal line.

Robert P. Wood

RPW/mam

Cc:

James Randall Davis, Esq.  
Davis Frawley, LLC  
140 East Main Street (29072)  
Post Office Box 489  
Lexington, South Carolina 29071  
(803) 359-251  
Randy@OldCourthouse.com  
Nicole@OldCourthouse.com  
Attorney for Respondent, Kellum Allen