

**RECEIVED**

**Jun 25 2025**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CLARENDON COUNTY  
CIRCUIT COURT

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Kristi F. Curtis, Circuit Court Judge

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Case No. 2017-CP-14-00127  
Appellate Case No. 2024-001875

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Kim E. Bevier.....Appellant,

v.

Palmetto Air Plantation Homeowners Association, Inc., .....Respondent.

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**MOTION FOR EXTENSION**

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Appellant hereby moves for an additional thirty (30) days in which to file its Initial Brief and Designation of Matter that is currently due July 9, 2025. If the extension is granted, the Initial Brief and Designation of Matter will be due on August 8, 2025. This motion is based on Counsel for Appellant has a pre-planned family vacation starting July 4, 2025 through July 14, 2025 and the relative complexity of the issues on appeal that are involved in this case and due to Counsel's busy deposition schedule.

\*\*\*SIGNATURE TO FOLLOW ON NEXT PAGE\*\*\*

**GOODWYN LAW FIRM, LLC**

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

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*Attorney for Appellant*

Columbia, South Carolina  
June 25, 2025

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Kim E. Bevier.....Appellant,

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**PROOF OF SERVICE**

I certify that I have served a copy of **Appellant’s MOTION FOR EXTENSION** on the following via EMAIL at the address below, on June 25, 2025.

Steven S. McKenzie  
Coffey & McKenzie, P.A.  
[smckenzie@ccmlawsc.com](mailto:smckenzie@ccmlawsc.com)

**GOODWYN LAW FIRM, LLC**

/s/ T. JEFF GOODWYN, JR.  
T. Jeff Goodwyn, Jr. (73789)  
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*Attorney for Appellant*

Columbia, South Carolina  
June 25, 2025

T. Jeff Goodwyn, Jr.\*†  
Jefferson D. Turnipseed\*\*

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\*\* Of Counsel

Email: JGoodwyn@Goodwynlaw.com  
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June 25, 2025

**VIA E-FILING AND MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**SC Court of Appeals**

RE: ***Kim E. Bevier v. Palmetto Air Plantation Homeowners Association, Inc.***  
*Circuit Court Case No.: 2017-CP-14-00127*  
*Appellate Case No.: 2024-001875*  
*Our File No.: 3000-0929*

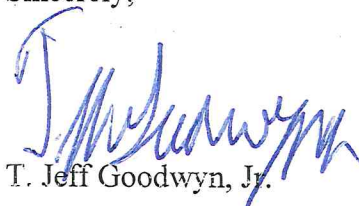
Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of Appellant's Motion for Extension, along with a Proof of Service, for filing in connection with the above-referenced matter. A check in the amount of \$50.00 is being placed in today's mail.

As evidenced by the Proof of Service, I have served all interested parties, with a copy.

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

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Steven S. McKenzie, Esquire (via email)