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Aug 07 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
CIRCUIT COURT

Kristi F. Curtis, Circuit Court Judge

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

Kim E. Bevier.....Appellant,

v.

Palmetto Air Plantation Homeowners Association, Inc.,Respondent.

MOTION FOR EXTENSION

Appellant hereby moves for an additional thirty (30) days in which to file its Initial Brief and Designation of Matter that is currently due August 8, 2025. If the extension is granted, the Initial Brief and Designation of Matter will be due on September 8, 2025 (30th day fell on Sunday). This motion is based on Counsel for Appellant had a close friend pass away 12 days ago and was required to attend an out-of-town funeral this past weekend during the time he had dedicated to preparing the initial brief. Counsel for Appellant also has had a busy litigation schedule including depositions, several mediations, a trial schedule keeping him out of the office this month. In addition, the relative complexity of the issues on appeal that are involved in this case require substantial time to brief.

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

2309 Devine Street

Columbia, SC 29205

(803) 251-4517

(803) 251-4527 Facsimile

jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina

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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 August 7, 2025.

Steven S. McKenzie
Coffey & McKenzie, P.A.
smckenzie@ccmlawsc.com

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.
T. Jeff Goodwyn, Jr. (73789)
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
(803) 251-4527 Facsimile
jgoodwyn@goodwynlaw.com
Attorney for Appellant

Columbia, South Carolina
August 7, 2025

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

GOODWYN LAW FIRM, LLC

Tel. (803) 251-4517
Fax (803) 251-4527

2309 Devine Street
Columbia, South Carolina 29205

*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

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SC Court of Appeals

VIA E-FILING AND MAIL

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

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

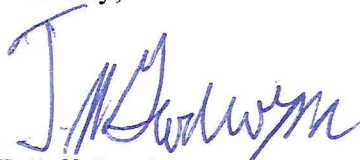
Dear Ms. Kitchings:

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)