

**RECEIVED**

**Aug 19 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appeal from Richland County  
Court of Common Pleas

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Patrick C. Fant, III, Circuit Court Judge

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

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

v.

Ann Marie Watson, .....Appellant.


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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF**

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Respondent, Kellum W. Allen, by and through his undersigned counsel, respectfully requests an extension until September 23, 2025 to file Respondent's Brief which is currently due on August 23, 2025.

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



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James Randall Davis, SC Bar No.: 1580  
DAVIS FRAWLEY, LLC  
140 East Main Street, P. O. Box 489  
Lexington, South Carolina 29071  
Phone No.: (803) 359-2512  
Attorney for Respondent

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Ann Marie Watson, .....Appellant.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

The undersigned counsel for Respondent 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.

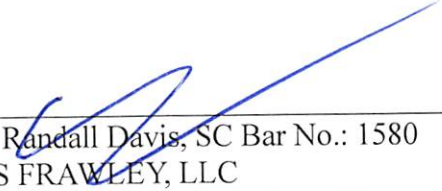
Respondent's filing fee in connection with this motion is being sent by U.S. Mail to the Office of the Clerk of the Court of Appeals, consistent with the Supreme Court Order 2020-05-29-02.

Document: Motion for Extension of Time to File Respondent's Brief

Counsel Served: For Appellant, Ann Marie Watson  
Robert P. Wood, Esquire  
Rogers Townsend, LLC  
1221 Main Street, 14<sup>th</sup> Floor  
Post Office Box 100200 (29202)  
Columbia, SC29201  
Robert.wood@rogerstownsend.com

Means of Delivery: Email Only

Date: August 19, 2025



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Francis C. Jones  
(1919 – 1968)

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(1921 – 2000)

Robert K. Bouknight  
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George S. Nicholson, Jr.  
(1942-2021)

Since 1961

August 19, 2025

South Carolina Court of Appeals  
Attn: The Honorable Jenny Abbott Kitchings  
Clerk of Court  
P.O. Box 11629  
Columbia, South Carolina 29211

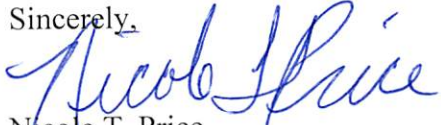
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**SC Court of Appeals**

RE: Kellum w. Allen, Respondent v. Ann Marie Watson, Appellant  
Appellate Case No.: 2025-000614  
Our File No.: 34703

Dear Ms. Kitchings:

Enclosed please find a check in the amount of \$50.00 for the costs associated with the Motion for Extension of Time to File Respondent's Brief and Proof of Service in regards to the above referenced matter. Please do not hesitate to contact me if you need any additional information.

Sincerely,

  
Nicole T. Price  
Paralegal

Enclosure

cc: For Appellant, Ann Marie Watson  
Robert P. Wood, Esquire  
Rogers Townsend, LLC  
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