

THE SOUTH CAROLINA COURT OF APPEALS

Appellate Case No. 2024-001284

Appeal from the Court of Common Pleas

The Honorable R. Ferrell Cothran Jr.

CASE #: 2024CP1400153 & 2024CP1400306

Mayshell Wilson, Appellant,

Vs.

Willie Mae Reed

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SC Court of Appeals

RESPONSE TO MOTION TO FILE OUT OF TIME

Respondent, by and through undersigned counsel, hereby responds to Appellant's *Motion to File Out of Time* and respectfully shows the following:

1. Respondent acknowledges receipt of Appellant's Motion requesting leave to file the Initial Brief and Designation of Matter out of time.
2. Appellant asserts "excusable neglect" as the basis for the untimely filing. However, Appellant fails to provide specific facts or documentation supporting a finding of excusable neglect as required under Rule 263, SCACR, and established appellate precedent.
3. The timely filing of briefs and records is essential to the orderly administration of justice and fairness to all parties. Granting extensions without adequate cause may result in undue delay and prejudice to Respondent.
4. Accordingly, Respondent respectfully objects to Appellant's Motion unless or until sufficient evidence of excusable neglect is presented to this Court.

WHEREFORE, Respondent prays that this Honorable Court deny Appellant's Motion to File Out of Time, or, in the alternative, require Appellant to provide a detailed showing of good cause and excusable neglect before granting such relief, and for such other and further relief as the Court deems just and proper.

Respectfully submitted this 9th day of October, 2025

Respectfully submitted,
/s/ William Joseph Virgil Barr

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on: Mayshell Wilson 6411 Summerton Highway Manning, South Carolina 29102 via U.S. regular mail and South Carolina Court of Appeals via email ctappfilings@sccourts.org this 9th day of October, 2025.

/s William Joseph Virgil Barr
South Carolina Bar No. 104883