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Feb 20 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Benjamin C.P. Sapp, Special Referee

Civil Action No. 2021-CP-15-00210

Christopher Hamilton, Cleo Hamilton, Janie Nelson a/k/a Jannie Nelson, Juanita Williams, Elvira Memminger, Clarence Washington, Delinda W. Dawson, David Washington, Jr., Elizabeth Ann Lee a/k/a Elizabeth Ann Cherri, Arthur Lee, Miranda Clark a/k/a Aranda Clark, Catherine Dent, Joseph Holmes, Gwendolyn Miller, Jan Elizabeth Burton, Brenda Brown, and Guy Ackerman, Plaintiffs,

of whom Gwendolyn Bright, Felicia Cox, Micah Frasier, Elizabeth Sawyer, Donald R. Smalls, Johnny J. Smalls, Leroy Smalls, Ralph B. Smalls, Cherise Walker Turner are the Appellants,

v.

Rehabilitation Consultants of Charleston, LLC., William Arnold Kellman, Priscilla Judge, Rhonda B. Winfield, Samuel Cox, Jr., Jimmy Cox, Lavorge Cox, Deshawn Rambert-Cox, Vanessa Cox a/k/a Vanessa Cox-Rickenbacker, Toni Cox a/k/a Tonya Piercy, Felicia Cox, Andrew Walker, Selena Walker, individually and as Personal Representative of the Estate of Earl Walker, Sonya Teresa White, Raymond Walker, Ardelia Stokes a/k/a Della Stokes, Leroy Smalls, Jr. a/k/a Leroy H. Smalls, Gwendolyn Bright, Elizabeth Sawyer, Johnny J. Smalls, Micah Frasier, Zelemania Walker a/k/a Sellemena Walker, Terrance Walker, George Walker, Jr., Cherise Walker Turner, Naomi Walker, Richard Cox, Richard Wilton Washington a/k/a Weldon Washington, Donna Mitchell and Curtis Mitchell, if they be alive, and John Doe and Jane Doe, whose true names are unknown and fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors, or assigns of the above-named Defendants, if they or any of them be dead, and of Charity Washington, Centrilla Washington, Andrew Washington, Priscilla Washington, a/k/a Persella Washington, Oscar Washington, Gertie Washington, Margaret Kellman, Horace Heyward, Delores Washington a/k/a Delores Williams, Johnny Washington a/k/a Johnnie Washington, Ruthie Mae Washington, Eugene Washington a/k/a Sam Washington, Geneva Washington, Maybel Walker a/k/a Maybelle Washington, Lilla Mae a/k/a Lucille

Cox Smalls, Leroy Smalls, Stanley Smalls a/k/a Ronnie Smalls, Willie Hayden Smalls, George Walker, Samuel Cox, Lucille Chisolm a/k/a Loucille Chisolm, Earl Walker, Pearl Hamilton, James Hamilton, Joseph Hamilton, Elise Simmons, James Washington, Victoria Johnson Green, David Washington, Sr., Carrier Washington a/k/a Carrie Washington Williams, Carrie Washington Lee, Joseph Lee, Norris Lee, Israel Washington, David Washington, Golden Washington, Minnie Brantley Johnson a/k/a Minnie Brantley, Mabel Simmons, William Washington a/k/a Billy Washington, Millie Washington, Phoebe Ann Washington, and Margaret Rovena Kellman, all deceased; and Mary Roe and Richard Roe, whose true names are unknown and fictitious names designation infants, persons under disability, incompetents, imprisoned, or those persons in the military, if any; South Carolina Department of Revenue, and also all other persons, known or whose true names are unknown, claiming any right, title, interest in, or lien upon the real estate described in the Complaint herein, Defendants.

of which Donna Mitchell and Curtis Mitchell are the Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION
OF MATTER FOR RECORD ON APPEAL**

Counsel for Appellants, Gwendolyn Bright, Felicia Cox, Micah Frasier, Elizabeth Sawyer, Donald R. Smalls, Johnny J. Smalls, Leroy Smalls, Ralph B. Smalls, Cherise Walker Turner, (hereinafter “Appellants”) respectfully move this Court to extend the time for filing Appellants’ initial brief and designation of matters to be included in the record on appeal in the above-captioned case pursuant to Rules 240, 263(b), and 267 of the South Carolina Appellate Court Rules, based upon the following circumstances:

1. The Notice of Appeal was served on Tuesday, December 23, 2025. Appellants’ initial brief and designation of matters to be included in the record on appeal was due on January 22, 2026, the Court granted an extension until February 22, 2026.
2. Undersigned counsel is presently handling multiple other pending matters, including time-sensitive obligations that require immediate attention during the period prescribed for filing Appellants’ initial brief and designation of record.

3. Due to these competing professional commitments, requiring compliance with the current deadline would impose a substantial hardship on Appellants and would materially limit counsel's ability to devote the time necessary for a thorough review of the record, careful legal research, and the preparation of a comprehensive and well-supported Initial Brief. Additional time is necessary to ensure that Appellants are represented to the fullest extent of counsel's ability.

4. Accordingly, Appellants respectfully request an extension of fifteen (15) days to file their Initial Brief and Designation of Matters to Be Included in the Record on Appeal, which would extend the deadline to March 9, 2026.

Respectfully submitted,

THE LAW OFFICES OF CHARLES S. ALTMAN, LLC

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Attorneys for Appellants

February 20, 2026

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Attorney for Respondents,

Donna Mitchell and Curtis Mitchell

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of whom Gwendolyn Bright, Felicia Cox, Micah Frasier, Elizabeth Sawyer, Donald R. Smalls, Johnny J. Smalls, Leroy Smalls, Ralph B. Smalls, Cherise Walker Turner are the Appellants,

v.

Rehabilitation Consultants of Charleston, LLC., William Arnold Kellman, Priscilla Judge, Rhonda B. Winfield, Samuel Cox, Jr., Jimmy Cox, Lavorge Cox, Deshawn Rambert-Cox, Vanessa Cox a/k/a Vanessa Cox-Rickenbacker, Toni Cox a/k/a Tonya Piercy, Felicia Cox, Andrew Walker, Selena Walker, individually and as Personal Representative of the Estate of Earl Walker, Sonya Teresa White, Raymond Walker, Ardelia Stokes a/k/a Della Stokes, Leroy Smalls, Jr. a/k/a Leroy H. Smalls, Gwendolyn Bright, Elizabeth Sawyer, Johnny J. Smalls, Micah Frasier, Zelemania Walker a/k/a Sellemena Walker, Terrance Walker, George Walker, Jr., Cherise Walker Turner, Naomi Walker, Richard Cox, Richard Wilton Washington a/k/a Weldon Washington, Donna Mitchell and Curtis Mitchell, if they be alive, and John Doe and Jane Doe, whose true names are unknown and fictitious names designating the unknown heirs, devisees, distributees, issue, executors, administrators, successors, or assigns of the above-named Defendants, if they or any of them be dead, and of Charity Washington, Centrilla Washington, Andrew Washington, Priscilla Washington, a/k/a Persella Washington, Oscar Washington, Gertie Washington, Margaret Kellman, Horace Heyward, Delores Washington a/k/a Delores Williams, Johnny Washington a/k/a Johnnie Washington, Ruthie Mae Washington, Eugene Washington a/k/a Sam Washington, Geneva Washington, Maybel Walker a/k/a Maybelle Washington, Lilla Mae a/k/a Lucille

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of which Donna Mitchell and Curtis Mitchell are the Respondents.

PROOF OF SERVICE

I hereby certify that the *Motion for Extension of Time to File Appellants' Brief and Designation of Matter for Record on Appeal* in this matter was served upon counsel of record for the Respondents by depositing a copy in the United States Postal Service, regular mail, and by electronic mail on this 20th day of February, 2026, addressed to counsel's primary e-mail address listed in the South Carolina Attorney Information System, as set forth below.

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Attorney for Respondents,

Donna Mitchell and Curtis Mitchell

Respectfully submitted,

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s/ Charles S. Altman

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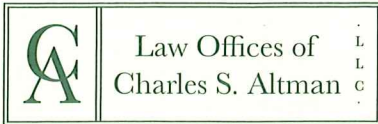
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Attorneys for Appellants

February 20, 2026



February 20, 2026

VIA FEDEX OVERNIGHT AND EMAIL ONLY

The Honorable Jenny Abbott Kitchings
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ctappfilings@sccourts.org

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Feb 20 2026

SC Court of Appeals

RE: Gwendolyn Bright, et al. v. Donna Mitchell, et al.
Appellate Case No.: 2025-002580

Dear Ms. Kitchings:

Please find enclosed for filing, on behalf of Appellants, the following documents:

1. Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter for Record on Appeal; and
2. Proof of Service of the Motion.

By copy to their counsel of record, J. Chris Lanning, Esq., Thomas H. Brush, Esq., and Harold A. Oberman, Esq., via filing and service by U.S. Mail (regular mail) and electronic mail, the Respondents in this case are simultaneously being served with this Motion.

A check for the filing fee of \$50.00 along with a hard copy of the attached documents are being mailed to the Court via FEDEX Overnight (to the address above) under separate cover.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Natalia Flores', written over a light blue horizontal line.

Natalia Flores

cc: Thomas H. Brush, Esq. (via USPS Regular Mail and Email only)
J. Chris Lanning, Esq. (via USPS Regular Mail and Email only)
Harold A. Oberman, Esq. (via USPS Regular Mail and Email only)

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