

Shawn R. Willis
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March 6, 2026

RECEIVED
Mar 06 2026
SC Court of Appeals

Via E-Mail to ctappfilings@sccourts.org

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

RE: Laura Schaible and Russell Schaible, Respondents, v. Ilonka Sonja Taylor and David Abdo, Appellants
Appellate Case No. 2026-000507

Dear Ms. Kitchings:

Please find enclosed with this letter as Exhibit A my correspondence with the court reporter requesting and receiving the trial transcript in this matter. I received the trial transcript from the court reporter on March 5, 2026.

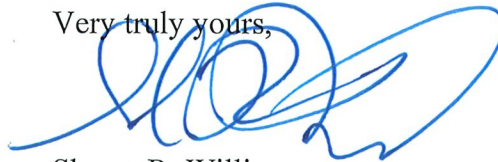
Pursuant to Rule 208(a)(1), Appellants' initial brief and designation of matter are currently due Monday, April 6, 2026. Appellants respectfully request a thirty (30) day extension of time to file their initial brief and designation of matter. With the extension, Appellants' initial brief and designation of matter would be due May 6, 2026.

This is the first extension request for these filings. Counsel for Respondents has consented to this extension request and such correspondence is included with this letter as Exhibit B. Our check in the amount of \$50.00 is being hand-delivered to the Court.

Lastly, I have been informed by Mr. Gowder that Mr. Moore is no longer practicing with Austen & Gowder, LLC. Out of an abundance of caution, I have reserved Mr. Moore today with the Notice of Appeal. An additional Proof of Service of the Notice of Appeal on Mr. Moore is included with this letter as Exhibit C.

March 6, 2026
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Page 2

Very truly yours,

A handwritten signature in blue ink, appearing to read "Shawn R. Willis", with a large, stylized flourish at the end.

Shawn R. Willis

Enclosures (as stated)

cc: W. Andrew Gowder, Jr., Esq. (via email)
Patrick Hollingsworth Moore, Esq. (via email)
Jennifer K. Williams, Esq. (via email)

Exhibit A

Shawn Willis

From: Josie A. Boehm <JBoehm@charlestoncounty.org>
Sent: Thursday, March 5, 2026 9:48 AM
To: Shawn Willis
Cc: Jennifer Williams; andy@austengowder.com; patrick@austengowder.com
Subject: Re: Schaible v Abdo - 2025CP1003402
Attachments: 10-22-2025 Laura Schaible v Ionka Sonja Taylor.pdf

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Use caution responding or clicking links/attachments.

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Attached - thank you!

Josie Boehm, RPR
Court Reporter
Master in Equity
100 Broad Street, Suite 266
Charleston, SC 29401
843-958-5071

From: Shawn Willis <shawn.willis@nelsonmullins.com>
Sent: Wednesday, March 4, 2026 4:25 PM
To: Josie A. Boehm <JBoehm@charlestoncounty.org>
Cc: Jennifer Williams <jennifer@jkwilliamslaw.com>; andy@austengowder.com <andy@austengowder.com>;
patrick@austengowder.com <patrick@austengowder.com>
Subject: RE: Schaible v Abdo - 2025CP1003402

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Thank you, Josie. Confirmed, I have filed a notice of appearance for the defendants and am counsel of record.

Shawn



SHAWN R. WILLIS **PARTNER**
shawn.willis@nelsonmullins.com

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From: Josie A. Boehm <JBoehm@charlestoncounty.org>
Sent: Wednesday, March 4, 2026 4:17 PM
To: Shawn Willis <shawn.willis@nelsonmullins.com>
Cc: Jennifer Williams <jennifer@jkwilliamslaw.com>
Subject: Re: Schaible v Abdo - 2025CP1003402

Good afternoon,

My records show that Ms. Williams requested this trial to be produced and has satisfied the invoice for it. Please confirm that you're counsel of record for the defendants, and I will forward you a copy.

Many thanks,

Josie

Josie Boehm, RPR
Court Reporter
Master in Equity
100 Broad Street, Suite 266
Charleston, SC 29401
843-958-5071

From: Martha S. Dennis <MDennis@charlestoncounty.org>
Sent: Wednesday, March 4, 2026 4:07 PM
To: Shawn Willis <shawn.willis@nelsonmullins.com>; Josie A. Boehm <JBoehm@charlestoncounty.org>
Cc: Jennifer Williams <jennifer@jkwilliamslaw.com>; andy@austengowder.com <andy@austengowder.com>; patrick@austengowder.com <patrick@austengowder.com>; Angela Garrett <angela.garrett@nelsonmullins.com>; MIELawClerk <MIELawClerk@charlestoncounty.org>
Subject: RE: Schaible v Abdo - 2025CP1003402

Good Afternoon,

I have cc'd Josie Boehm, our court reporter, on this response so she can assist you with your request.

Many Thanks,

Martha "Marti" Dennis, Esq.
Roster and Scheduling Clerk/Attorney
Charleston County Master-In-Equity's Office
100 Broad Street
Suite 266
Charleston, SC 29401
MDennis@charlestoncounty.org
843-958-5053 direct
843-958-5077 fax

From: Shawn Willis <shawn.willis@nelsonmullins.com>
Sent: Wednesday, March 04, 2026 3:54 PM
To: Martha S. Dennis <MDennis@charlestoncounty.org>
Cc: Jennifer Williams <jennifer@jkwilliamslaw.com>; andy@austengowder.com; patrick@austengowder.com; Angela

Garrett <angela.garrett@nelsonmullins.com>
Subject: RE: Schaible v Abdo - 2025CP1003402

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Hi Marti,

I sent the email below to Lillian regarding ordering a trial transcript for an appeal, but received an autoreply saying that she is out of the office this week. Please see below. Can you assist?

Thank you,
Shawn



SHAWN R. WILLIS **PARTNER**
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From: Shawn Willis
Sent: Wednesday, March 4, 2026 3:52 PM
To: 'MIELawClerk' <MIELawClerk@charlestoncounty.org>
Cc: Jennifer Williams <jennifer@jkwilliamsllaw.com>; andy@austengowder.com; patrick@austengowder.com; Angela Garrett <angela.garrett@nelsonmullins.com>
Subject: RE: Schaible v Abdo - 2025CP1003402

Hi Lillian,

Hope all is well. We served and filed a Notice of Appeal with the Court of Appeals today in this case, which we will also be filing in the Charleston County Clerk's office this afternoon. I need to order a trial transcript for the appeal. Should I direct that request to you or to someone else?

Thank you,
Shawn



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Exhibit B

Shawn Willis

From: Andy Gowder <andy@austengowder.com>
Sent: Friday, March 6, 2026 10:05 AM
To: Shawn Willis; Bailey Pope
Subject: Re: Notice of Appeal - Schaible v. Abdo - 2025CP1003402

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Shawn,

Yes, I agree.

And just a note that Patrick Moore is no longer practicing with our firm. Please do copy Bailey Pope, though, in our correspondence.

Thanks!

W. Andrew Gowder, Jr.,

Austen & Gowder, LLC

P.O. Box 20820

Charleston, SC 29413

1629 Meeting Street, Suite A

Charleston, South Carolina 29405

843.727.2229 Office

843.870.0307 Mobile

From: Shawn Willis <shawn.willis@nelsonmullins.com>
Sent: Friday, March 6, 2026 9:31 AM
To: Andy Gowder <andy@austengowder.com>; Patrick Moore <patrick@austengowder.com>
Subject: RE: Notice of Appeal - Schaible v. Abdo - 2025CP1003402

Andy and Patrick,

Good morning. Based on Josie's email to me yesterday with the transcript, the due date for me to file our initial brief and designation is Monday, April 6. Would you be willing to consent to a 30 day extension until May 6 for me to file our initial brief and designation? I am working on a number of other matters with

deadlines this month and I also am trying to work out a family trip for the kids' spring break the week after Easter.

Thanks,
Shawn



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shawn.willis@nelsonmullins.com

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From: Shawn Willis
Sent: Wednesday, March 4, 2026 1:11 PM
To: Andy Gowder <andy@austengowder.com>; patrick@austengowder.com
Cc: Jennifer Williams <jennifer@jkwilliamslaw.com>
Subject: Notice of Appeal - Schaible v. Abdo - 2025CP1003402

Andy and Patrick,

Please find attached for service on the Respondents Laura Schaible and Russell Schaible in the above matter a copy of the Notice of Appeal of Ilonka Sonja Taylor and David Abdo as Appellants, along with a Proof of Service, which will be filed with the South Carolina Court of Appeals electronically today. The filing fee for the Notice of Appeal will be hand delivered to the Court of Appeals tomorrow.

I am also depositing a hard copy of the Notice of Appeal in the mail to your office today. A copy of that transmittal letter is included in the attachment as well.

Please let me know if you have any questions.

Best,
Shawn



SHAWN R. WILLIS **PARTNER**
shawn.willis@nelsonmullins.com

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Exhibit C

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

Case No. 2025-CP-10-03402

Laura Schaible and Russell Schaible, Respondents,
v.
Ilonka Sonja Taylor and David Abdo, Appellants.

PROOF OF SERVICE

I, the undersigned attorney with the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant, certify that I have served counsel Patrick Hollingsworth Moore, who is no longer with the firm Austen & Gowder, LLC but is still listed as an additional counsel of record for Respondents, with a copy of the document(s) specified below by electronic mail using his primary email address listed in the Attorney Information System.

PLEADING(s): NOTICE OF APPEAL

Counsel Served: Patrick Hollingsworth Moore
E-Mail: phmlaw@gmail.com

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: *s/ Shawn R. Willis*
Shawn R. Willis
Attorney

Charleston, South Carolina
March 6, 2026

Shawn Willis

From: Shawn Willis
Sent: Friday, March 6, 2026 3:06 PM
To: 'phmlaw@gmail.com'
Subject: FW: Notice of Appeal - Schaible v. Abdo - 2025CP1003402
Attachments: Letter to opposing counsel - serving Notice of Appeal - Schaible v. Abdo - with enclosures - 4906-7316-4948 1.pdf

Patrick,

Andy Gowder has informed me that you are no longer practicing with Austen & Gowder. I am forwarding to you at the email address I found for you today in the AIS system the email below that I sent on March 4 for service on the Respondents Laura Schaible and Russell Schaible in the above matter a copy of the Notice of Appeal of Ilonka Sonja Taylor and David Abdo as Appellants. A copy of the Notice of Appeal is attached to this email.

Best,
Shawn



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shawn.willis@nelsonmullins.com

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Sent: Wednesday, March 4, 2026 1:11 PM
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Cc: Jennifer Williams <jennifer@jkwilliamsllaw.com>
Subject: Notice of Appeal - Schaible v. Abdo - 2025CP1003402

Andy and Patrick,

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Please let me know if you have any questions.

Best,
Shawn



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shawn.willis@nelsonmullins.com

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