

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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Jun 18 2026

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCroy, Circuit Court Judge
Julie J. Armstrong, Charleston County Clerk of Court
Mikell R. Scarborough, Master-In-Equity

Case No. 2025-002014

Danielle C. Brown,
Respondent,

v.

Crystal Brown Nwaneri,
Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE FINAL BRIEF AND RECORD ON
APPEAL, TO STAY CURRENT DEADLINES PENDING DISPOSITION OF THIS
MOTION, AND TO SUPPLEMENT/SETTLE THE RECORD**

Appellant Crystal Brown Nwaneri, proceeding *pro se*, respectfully moves for an extension of twenty-one (21) days to file the Final Brief and Record on Appeal, for a stay of the current Rule 210 and Rule 211 deadlines pending disposition of this motion, and for leave to supplement and/or settle the record pursuant to Rule 212, SCACR.

In support of this motion, Appellant states:

1. This motion is being filed on the deadline established by the Clerk's May 29, 2026 correspondence. Appellant files it before expiration of that deadline because, despite diligent efforts, she cannot responsibly submit a compliant Record on Appeal by today and believes it is better to seek the Court's guidance now than to submit an incomplete or inaccurate record.

2. On May 29, 2026, the Clerk advised Appellant that Respondent had not filed an initial brief or designation of matter and directed Appellant to proceed with filing the Final Brief and Record on Appeal within twenty days.
3. Upon receiving that correspondence, Appellant began the process of identifying, gathering, organizing, and reviewing the materials necessary to prepare the Record on Appeal.
4. During review, Appellant discovered issues concerning the completeness of the record that had not previously become apparent because the appeal had not yet reached the record-compilation stage contemplated by Rules 210 and 211.
5. In particular, Appellant identified materials referenced during the proceedings below, including communications and other matters that were before the lower tribunal or referenced during the proceedings, but which do not presently appear to be reflected in the record in a complete manner.
6. Appellant does not seek to introduce new evidence on appeal. Rather, Appellant seeks to ensure that the record accurately reflects what occurred below and that any record submitted to this Court is complete and reliable.
7. At present, the Record on Appeal has not been assembled, indexed, paginated, or finalized. Following receipt of the Clerk's May 29, 2026 correspondence, Appellant began the process of compiling the Record on Appeal and, in doing so, identified the record issues described above. Given those issues and the work necessary to prepare a compliant Rule 210 Record, Appellant cannot responsibly complete and file the Record before the current deadline.
8. During the twenty-day period following the Clerk's correspondence, Appellant was also required to participate in multiple emergency proceedings in separate courts concerning preservation and disposition of estate property, which necessarily limited the time available to complete the substantial work required to assemble and review the Record on Appeal.
9. Appellant further seeks leave to file a revised Final Brief after the record issues have been resolved and the Record on Appeal has been finalized. This will permit accurate record citations and ensure that the Final Brief is prepared using the complete and settled record before the Court.
10. Respondent has not filed an initial brief or designation of matter and therefore will suffer little, if any, prejudice from a short extension designed to permit preparation of a complete and accurate Record on Appeal.
11. By contrast, requiring Appellant to proceed immediately risks the submission of an incomplete Record on Appeal and a Final Brief prepared without the benefit of a settled record, which would not serve the interests of judicial economy or meaningful appellate review.

WHEREFORE, Appellant respectfully requests that the Court:

- A. Extend the deadline for filing the Final Brief and Record on Appeal by twenty-one (21) days, or such additional time as the Court deems appropriate;
- B. Stay the current Rule 210 and Rule 211 deadlines pending disposition of this motion;
- C. Permit supplementation and/or settlement of the record pursuant to Rule 212, SCACR;

- D. Permit Appellant to file a revised Final Brief following resolution of the record issues;
and
- E. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Crystal Brown Nwaneri

Crystal Brown Nwaneri
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Appellant, *Pro Se*

Date: June 18, 2026

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2026, I served a true and correct copy of the foregoing Motion upon counsel for Respondent by electronic mail:

Logan Davis, ldavis@gravesdavis.com
Tyler Graves, tgraves@gravesdavis.com

/s/ Crystal Brown Nwaneri
Crystal Brown Nwaneri
Appellant, *Pro Se*

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