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Jul 22 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
Appellate Case No. 2025-002580

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, 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 Rovenka 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 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,

and

Donna Mitchell and Curtis Mitchell are the Respondents.

MOTION FOR EXTENSION OF TIME TO FILE FINAL BRIEFS

Counsel for Appellants and Respondents respectfully move this Court, pursuant to Rules 240, 263(b), and 267 of the South Carolina Appellate Court Rules, for an extension of time to file their final briefs, and in support thereof state as follows:

1. On July 17, 2026, counsel for Appellants and Respondents jointly submitted a letter to the Court of Appeals advising that, after the Record on Appeal had been filed, the parties discovered that an incorrect exhibit had inadvertently been included in the Record. The parties requested the Record on Appeal be supplemented as set forth within the letter attached as Exhibit A.

2. As of July 21, 2026, the Court has not yet ruled on the parties' July 17, 2026 request regarding correction of the Record on Appeal. Accordingly, the parties do not yet know whether the Record must be supplemented before the final briefs are filed.

3. The parties' final briefs are currently due on July 27, 2026, as the original due date of July 26, 2026, falls on a Sunday.

4. If the Court permits the requested correction, the parties will need time to supplement the Record on Appeal before preparing, filing, and serving their final briefs. Given the current briefing deadline and the uncertainty as to when the Court will rule, an extension is necessary to allow the parties to comply with the instructions of the Court and to prepare their briefs based upon the finalized Record on Appeal.

5. Accordingly, Appellants and Respondents respectfully request that this Court extend the deadline for filing their final briefs up to and including August 17, 2026.

[signature page follows]

Respectfully submitted,

The Law Offices of Charles S. Altman, LLC

s/ Charles S. Altman
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Natalia Flores (S.C. Bar 106905)
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Tel: 843-853-9907
Attorneys for Appellants

Oberman & Oberman, LLC

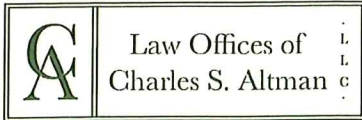
s/ Harold A. Oberman
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Facsimile: 843-722-7359
Attorney for Respondents, Donna Mitchell and Curtis Mitchell

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12 Carriage Lane, Suite A
Charleston, SC 29407
Tel: 843-766-5576
Attorneys for Respondents, Donna Mitchell and Curtis Mitchell

July 22, 2026

EXHIBIT A



RECEIVED

Jul 17 2026

SC Court of Appeals

July 17, 2026

VIA USPS AND EMAIL ONLY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: Gwendolyn Bright, et al. v. Donna Mitchell, et al.
Appellate Case No.: 2025-002580
Our File No: 21-1830

Dear Ms. Kitchings:

Earlier this week, after the Record on Appeal had already been filed, it came to our attention that an incorrect exhibit had been inadvertently included in the Record on Appeal in connection with the transcript of the May 25, 2023 hearing already contained in the Record. By way of background, two separate hearings were held on May 25, 2023—one concerning a matter unrelated to the issues on appeal and another concerning the issues presently before the Court of Appeals. The exhibit currently included in the Record on Appeal pertains to the unrelated matter and is the incorrect exhibit included in the Record.

Accordingly, with the consent of all parties, Appellants respectfully request that, unless the Court deems otherwise, the Court permit Appellants to withdraw from the Record on Appeal ROA_0233–0253, consisting of the exhibit entitled "*Plaintiff, Christopher Hamilton's Exhibit 1 to Hearing Held on May 25, 2023, Filed May 31, 2023*," as it concerns a separate matter unrelated to this appeal. Appellants further request that, unless the Court deems otherwise, the Record on Appeal be supplemented by inserting, in place of the withdrawn exhibit, the correct one-page exhibit (which is attached to this letter) at ROA_0233, to be entitled "*Donna Mitchell and Curtis Mitchell's Exhibit 1 to Hearing Held on May 25, 2023*," so that the Record on Appeal and corresponding Table of Contents accurately reflect the exhibit referenced in the transcript of the May 25, 2023 hearing.

Appellants further request that, unless the Court deems otherwise, ROA_0001–0232 and ROA_0254–0304 remain unchanged, including their existing page numbering and references for purposes of the parties' final briefs.

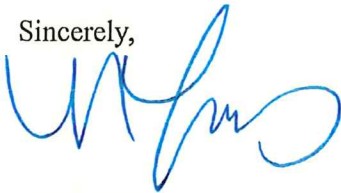
Supplementation is necessary to ensure that the Record on Appeal accurately reflects the proceedings before the trial court and provides the Court with the complete and correct record for its review of

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
July 17, 2026
Page Two

the issues on appeal. The correct exhibit is referenced in the transcript of the May 25, 2023 hearing and relied upon in Respondents' Brief.

Appellants respectfully request the Court's prompt consideration of this request in light of the July 26, 2026 deadline for the filing of final briefs.

Sincerely,



Natalia Flores
nflores@caltmanlaw.com

encs: as stated

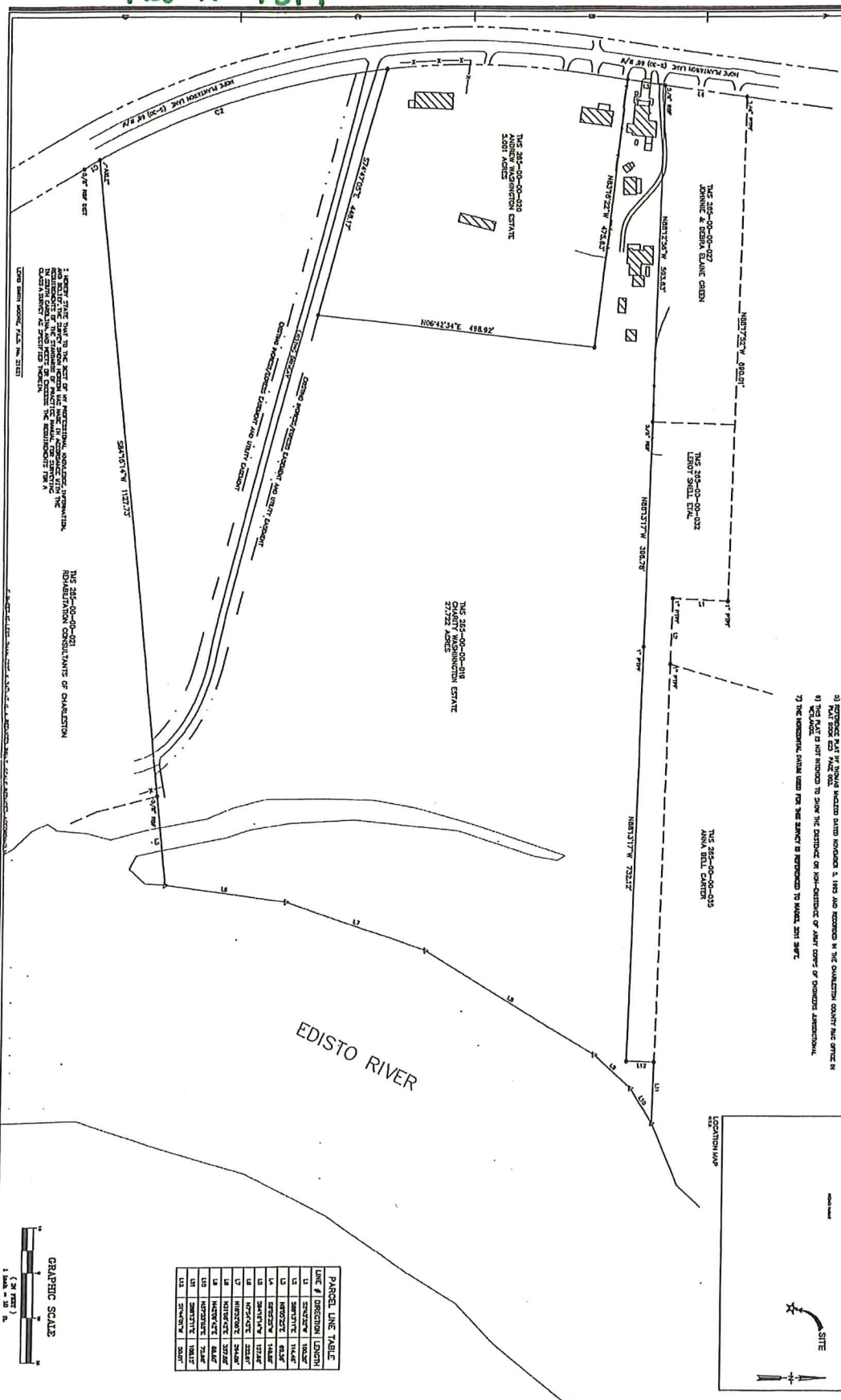
cc: Thomas H. Brush, Esq. (*via Email only*)
J. Chris Lanning, Esq. (*via Email only*)
Harold Oberman, Esq. (*via Email only*)

Hamilton

PLANTIFF'S
EXHIBIT
1

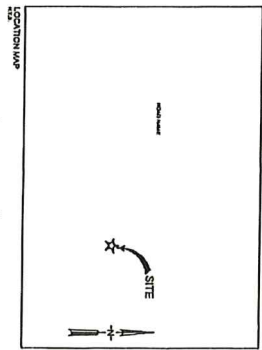
PARCEL CURVE TABLE

CURVE #	LENGTH	BEARING	CHORD	DIRECTION	CHORD LENGTH
C1	23.47'	S 84° 12' E	23.47'	21° 30' E	23.47'
C2	34.24'	S 84° 12' E	34.24'	21° 30' E	34.24'
C3	34.24'	S 84° 12' E	34.24'	21° 30' E	34.24'



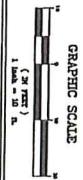
NOTES AND REFERENCES

- 1) THE PROPERTY IS OWNED BY CHARITY WASHINGTON ESTATE.
- 2) THE TRAIL AREA OF THE PROPERTY IS 37222 ACRES AND THE CURRENT SURVEY.
- 3) ACCORDING TO THE FLOOD RESISTANCE MAP DATED 1985 THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 4) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 5) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 6) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 7) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 8) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 9) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).
- 10) THE PROPERTY LIES IN A FLOOD ZONE (FLOOD ZONE 1).



PARCEL LINE TABLE

LINE #	DIRECTION	LENGTH
1	S 84° 12' E	23.47'
2	S 84° 12' E	34.24'
3	S 84° 12' E	34.24'
4	S 84° 12' E	34.24'
5	S 84° 12' E	34.24'
6	S 84° 12' E	34.24'
7	S 84° 12' E	34.24'
8	S 84° 12' E	34.24'
9	S 84° 12' E	34.24'
10	S 84° 12' E	34.24'
11	S 84° 12' E	34.24'
12	S 84° 12' E	34.24'
13	S 84° 12' E	34.24'
14	S 84° 12' E	34.24'
15	S 84° 12' E	34.24'
16	S 84° 12' E	34.24'
17	S 84° 12' E	34.24'
18	S 84° 12' E	34.24'
19	S 84° 12' E	34.24'
20	S 84° 12' E	34.24'
21	S 84° 12' E	34.24'
22	S 84° 12' E	34.24'
23	S 84° 12' E	34.24'
24	S 84° 12' E	34.24'
25	S 84° 12' E	34.24'
26	S 84° 12' E	34.24'
27	S 84° 12' E	34.24'
28	S 84° 12' E	34.24'
29	S 84° 12' E	34.24'
30	S 84° 12' E	34.24'
31	S 84° 12' E	34.24'
32	S 84° 12' E	34.24'
33	S 84° 12' E	34.24'
34	S 84° 12' E	34.24'
35	S 84° 12' E	34.24'
36	S 84° 12' E	34.24'
37	S 84° 12' E	34.24'
38	S 84° 12' E	34.24'
39	S 84° 12' E	34.24'
40	S 84° 12' E	34.24'
41	S 84° 12' E	34.24'
42	S 84° 12' E	34.24'
43	S 84° 12' E	34.24'
44	S 84° 12' E	34.24'
45	S 84° 12' E	34.24'
46	S 84° 12' E	34.24'
47	S 84° 12' E	34.24'
48	S 84° 12' E	34.24'
49	S 84° 12' E	34.24'
50	S 84° 12' E	34.24'
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52	S 84° 12' E	34.24'
53	S 84° 12' E	34.24'
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61	S 84° 12' E	34.24'
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63	S 84° 12' E	34.24'
64	S 84° 12' E	34.24'
65	S 84° 12' E	34.24'
66	S 84° 12' E	34.24'
67	S 84° 12' E	34.24'
68	S 84° 12' E	34.24'
69	S 84° 12' E	34.24'
70	S 84° 12' E	34.24'
71	S 84° 12' E	34.24'
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80	S 84° 12' E	34.24'
81	S 84° 12' E	34.24'
82	S 84° 12' E	34.24'
83	S 84° 12' E	34.24'
84	S 84° 12' E	34.24'
85	S 84° 12' E	34.24'
86	S 84° 12' E	34.24'
87	S 84° 12' E	34.24'
88	S 84° 12' E	34.24'
89	S 84° 12' E	34.24'
90	S 84° 12' E	34.24'
91	S 84° 12' E	34.24'
92	S 84° 12' E	34.24'
93	S 84° 12' E	34.24'
94	S 84° 12' E	34.24'
95	S 84° 12' E	34.24'
96	S 84° 12' E	34.24'
97	S 84° 12' E	34.24'
98	S 84° 12' E	34.24'
99	S 84° 12' E	34.24'
100	S 84° 12' E	34.24'



BOUNDARY SURVEY
TMS 265-00-00-019
1869 HOPE PLANTATION LANE
COLLETON COUNTY, SOUTH CAROLINA

FORSBERG ENGINEERING AND SURVEYING, INC.
1507 SAVANNAH HIGHWAY SUITE B
CHARLESTON, SOUTH CAROLINA 29412
(843) 551-1234
FORSBERG ENGINEERING AND SURVEYING, INC.
AND LANDSCAPE ARCHITECTURE

DATE: 3/27/2022
DRAWN/CHECKED: LMS/JSC
LAST REVISION:
APPROVED:
SCALE: 1"=40'
PROJECT NO.:
FILE NO.:
SHEET NUMBER: 1 OF 1

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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 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,

and

Donna Mitchell and Curtis Mitchell are the Respondents.

PROOF OF SERVICE

I hereby certify that the *Appellants' and Respondents' Joint Motion for Extension of Time to File Final Briefs*, 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 22nd day of July, 2026, addressed to counsel's primary e-mail address listed in the South Carolina Attorney Information System, as set forth below.

Brush Law Firm, P.A.

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tbrush@brushlawfirm.com

J. Chris Lanning (SC Bar No.: 73957)

clanning@brushlawfirm.com

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Attorneys for Respondents,

Donna Mitchell and Curtis Mitchell

Oberman & Oberman, LLC

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Charleston, SC 29407

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Facsimile: 843-722-7359

Attorney for Respondents,

Donna Mitchell and Curtis Mitchell

Respectfully submitted,

THE LAW OFFICES OF CHARLES S. ALTMAN, LLC

s/ Charles S. Altman

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Natalia Flores (S.C. Bar 106905)

nflores@caltmanlaw.com

575 King Street, Suite A

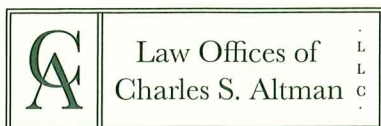
Charleston, SC 29401

Tel: 843-853-9907

Fax: 843-722-5702

Attorneys for Appellants

July 22, 2026



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SC Court of Appeals

July 22, 2026

VIA FEDEX OVERNIGHT AND EMAIL ONLY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: *Gwendolyn Bright, Felicia Cox, et al. v. Donna Mitchell and Curtis Mitchell*
Appellate Case No: 2025-002580

Dear Ms. Kitchings:

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

1. Appellants' and Respondents' Joint Motion for Extension of Time to File Final Briefs; and
2. Proof of Service of Appellants' and Respondents' Joint Motion for Extension of Time to File Final Briefs.

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 the documents referenced above.

Sincerely,

A handwritten signature in blue ink, appearing to read 'N. Flores', with a stylized flourish at the end.

Natalia Flores
nflores@caltmanlaw.com

encs: as stated

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