

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
CIRCUIT COURT

Frank R. Addy, Circuit Court Judge

Case No. 2024-CP-32-02187
Appellate Case No. 2026-000711

Robert William Addy.....Appellant,

v.

Taylor Nicole Pickett and Albert Eugene Baker.....Respondents.

MOTION FOR EXTENSION

Respondents hereby move for an additional thirty (30) days in which to file their Initial Brief and Designation of Matter that is currently due July 29, 2026. If the extension is granted, the Initial Brief and Designation of Matter will be due on August 29, 2026. This motion is based on Counsel for Respondents pre-planned family vacation starting July 13-17, 2026 and July 27 through August 7, 2026 and the relative complexity of the issues on appeal that are involved in this case and due to Counsel's busy trial and deposition schedule.

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GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

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Attorney for Appellant

Columbia, South Carolina
July 24, 2026

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SC Court of Appeals

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PROOF OF SERVICE

I certify that I have served a copy of **Respondent's Motion for Extension** on the following
via **EMAIL** at the address below, on July 24, 2026.

Tobias G. Ward, Jr., Esquire
J. Derrick Jackson, Esquire
PO Box 50124
Columbia, SC 29250
tw@tobywardlaw.com
dj@tobywardlaw.com

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Respectfully submitted,

GOODWYN LAW FIRM, LLC

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Attorney for Respondent

July 24, 2026

Columbia, South Carolina

T. Jeff Goodwyn, Jr.*†
Jefferson D. Turnipseed**

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** Of Counsel

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July 24, 2026

VIA E-FILING AND MAIL

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

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RE: ***Robert William Addy v Taylor Nicole Pickett and Albert Eugene Baker***
Circuit Court Case No.: 2024-CP-32-02187
Appellate Case No.: 2026-000711
Our File No.: 3000-0915

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of Respondent's Motion for Extension, along with a Proof of Service, for filing in connection with the above-referenced matter. A check in the amount of \$50.00 is being placed in today's mail.

As evidenced by the Proof of Service, I have served all interested parties, with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Tobias G. Ward, Jr., Esquire
J. Derrick Jackson, Esquire
(all via email)