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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Thomas J. Rode, Circuit Court Judge

Appellate Case No. 2026-000229

In re: Estate of James L. Strobel, Deceased,

Daniel Lloyd Strobel; James Andrew Strobel; John Anthony Strobel; and Peter Nicholas Strobel, Respondents,

v.

Paula M. Strobel, as Personal Representative of the Estate of James L. Strobel and individually; Dorothy Elizabeth Strobel Bell, as an interested person; and Zoie P. Ogletree, as an interested person, Defendants,

of whom Paula M. Strobel, as Personal Representative of the Estate of James L. Strobel and individually; and Dorothy Elizabeth Strobel Bell, as an interested person, are the Appellants.

MOTION FOR EXTENSION OF TIME

Appellants hereby request a seven-day extension to file their initial brief and designation of matter, which would then be due Monday, August 10, 2026. The grounds for this Motion are as follows.

When the Court granted Appellants' request for an extension on March 23, 2026, Respondents filed their Motion to Dismiss seven days later on March 30, 2026. With that Motion, the deadlines for

perfecting the appeal were stayed. Rule 240(b), SCACR. Thereafter, Appellants had to address and respond to Respondents' Motion.

Since the Court resolved the Motion to Dismiss, Appellants have requested one extension, which was granted by the Court. This made Appellants brief due August 3, 2026. When the August 3, 2026 deadline was set by the Court, the undersigned failed to recognize that August 2, 2026 was his 50th birthday, and further, also failed to recognize that he was scheduled to attend a family vacation at Litchfield Beach with his wife and children from August 1, 2026 through August 8, 2026. Upon realizing the same, the undersigned did not request another extension but began diligently working to meet the August 3, 2026 deadline. Those efforts included delaying his attendance at the family vacation and working throughout the day and evening of August 2, 2026. Counsel hoped these efforts would make it possible to comply with the Court's deadline.

However, while working on Appellants initial brief on August 2, 2026, the undersigned experienced technology issues that prevented him from having meaningful access to the pdfs files that constitute the case file. In the mist of attempting to resolve the same, lead opposing counsel was contacted about the possibility of consenting to another short extension. Opposing counsel graciously understood and even noted that the undersigned should "enjoy your birthday." Notwithstanding the same, the undersigned continued working to try and meet the August 3, 2026 deadline.

Unfortunately, during the evening hours of August 2, 2026, while the undersigned continued to try and meet the August 3, 2026 deadline, a torrential rainstorm erupted over his office. While the undersigned's office is typically prepared for rain, and as fate would have it, there is currently no roof on the undersigned's building, as the 100 year old roof is undergoing replacment. When the rain began, it poured into the undersigned's office generously. When this occurred, the undersigned had no choice but to cease his efforts and focus on rain directly entering his office.

Fortunately, the undersigned and the roofing contractor were able to mitigate the situation by making temporary repairs to the "rain and ice shield" that was supposed to temporarily protect the roof before replacement tin was installed. This, along with water mitigation efforts, took hours. Unfortunately, the combination of all these events has placed counsel in a position that he needs a short extension to properly present his clients appeal to the Court.

Appellants' counsel is aware that this Court stated in its prior order that no further extensions would be granted. Counsel worked hard to meet that mandate, including delaying a family vacation and working throughout his 50th birthday. But technology issues coupled with a roofless rain storm have made it clear that more time is needed. With the expressed consent of lead opposing counsel, a 7 day extension is respectfully requested.

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Beaufort, South Carolina

August 3, 2026

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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

The Honorable Thomas J. Rode, Circuit Court Judge
Trial Court Case No. 2022ES1000235

Appellate Case No. 2026-000229

In re: Estate of James L. Strobel, Deceased,

Daniel Lloyd Strobel; James Andrew Strobel; John Anthony Strobel; and Peter Nicholas Strobel, Respondents,

v.

Paula M. Strobel, as Personal Representative of the Estate of James L. Strobel and individually; Dorothy Elizabeth Strobel Bell, as an interested person; and Zoie P. Ogletree, as an interested person, Defendants,

of whom Paula M. Strobel, as Personal Representative of the Estate of James L. Strobel and individually; and Dorothy Elizabeth Strobel Bell, as an interested person, are the Appellants.

PROOF OF SERVICE

I hereby certify that on the 3rd day of August 2026 I have caused the service of the Appellants' **Motion for Extension of Time** by electronic mail using the email address listed in the Attorney Information System, to the attorney for record at the address listed below:

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August 3, 2026

Via Electronic Mail

RECEIVED
Aug 03 2026
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
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RE: In re: Estate of James L. Strobel; Appellate Case No. 2026-000229

Dear Ms. Kitchings:

I represent Appellants Paula M. Strobel and Dorothy Elizabeth Strobel Bell in the above-referenced matter. Pursuant to the Court's Order of July 6, 2026, Appellant's Initial Brief and Designation of Matter were due by August 3, 2026.

Appellants respectfully request a seven (7) day extension of time to file their Initial Brief and Designation of Matter, extending the deadline to August 10, 2026 due to the extenuating circumstances detailed in the Motion. We have conferred with counsel for Respondents Daniel Lloyd Strobel, James Andrew Strobel, John Anthony Strobel, and Peter Nicholas Strobel, and they consent to this request for a seven (7) day extension.

Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021), a check in the amount of $50.00 for the filing fee is being forwarded separately via US mail.

Thank you for your time and consideration to this request. If you have any questions or wish to discuss it further, please do not hesitate to contact me.

With kindest regards, I remain,

Cordially,

J. Ashley Twombley

cc: Daniel F. Blanchard, III (dblanchard@rosenhagood.com)

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