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THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

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SEP 09 2015
SC Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

Case No. 2013-CP-11-0373

Peggy Ineta Whittenberg, Individually and as Personal
Representative of the Estates of Lucille W. Littlejohn,
deceased, and Alfred R. Littlejohn, deceased, Appellant

v.

Rayford Camp, Individually and as Personal Representative
of the Estate of J.A. Littlejohn, deceased; Kathy J. Byers,
Nolan Richmond, Jr.; John Thomas Littlejohn, Jr.;
Quinton Littlejohn; and Zandy Fay Jeffries Boyce, Respondents

APPELLANT'S MOTION FOR EXTENSION OF TIME

Appellant Peggy Whittenberg does hereby Move for an Extension of Time to file her Initial Brief and Record on Appeal, currently due on September 11, 2015. Appellant requests an additional 120 days, for the reasons set forth below.

It is hoped by counsel for all parties that this case will be resolved entirely during said period of time. Counsel for the parties believe that there is reasonable likelihood of resolving this matter by settlement at mediation, and that incurring additional attorneys fees and costs for preparation of briefs and the record would be unproductive.

This case involves issues of partition of estate property. The estate and the subject real property have been litigated for over 15 years now.

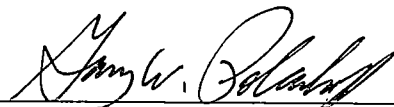
Counsel for Appellant and Respondents have held discussions regarding resolution, and have agreed to mediate this case. In the furtherance of case resolution, counsel for both parties also met together recently with a real estate appraiser, for the purpose of analyzing value of various sections of the subject property. Further, the attorneys for the parties have agreed for the real estate appraiser to be present at the mediation. The parties have also agreed on a mediator and are attempting to schedule this.

Counsel for Respondents, William O. Pressley, Jr., concurs with this Request for Extension of Time, and concurs with the proposition that spending money, resources and time for briefing, while the parties are sincerely attempting resolution, would be unproductive.

As the parties have agreed to mediation, coupled with meeting and involvement jointly with a real estate appraiser for guidance, and have taken other steps toward resolution, with reasonable expectations that this matter may be fully resolved, Appellant hereby requests an extension of 120 days to file Initial Brief and the Record on Appeal.

September 4, 2015
Spartanburg, SC

Respectfully submitted,



Gary W. Poliakoff (S.C. Bar #4488)
POLIAKOFF & ASSOCIATES, P.A.
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Spartanburg, SC 29304
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ATTORNEY FOR APPELLANT

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Quinton Littlejohn; and Zandy Fay Jeffries Boyce, Respondents

AFFIDAVIT OF COUNSEL

Personally appeared before me Gary W. Poliakoff, who having been duly sworn, deposes and
states:

1. That is over the age of 18 and is competent to issue this Affidavit.
2. That he is an attorney currently licensed in the State of South Carolina and represents
the Appellant in this matter.
3. That the statements made in the accompanying Appellant's Motion for Extension of
Time are true of his own knowledge and/or based on his best information and belief at this time.

Subscribed and sworn to before me this
4th day of September, 2015

Mrs. Paulson
Notary Public for South Carolina
My commission expires: 10/19/15

Gary W. Poliakoff
Gary W. Poliakoff (S.C. Bar #4488)
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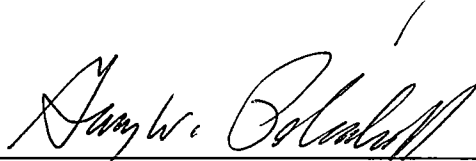
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Nolan Richmond, Jr.; John Thomas Littlejohn, Jr.;
Quinton Littlejohn; and Zandy Fay Jeffries Boyce, Respondents

PROOF OF SERVICE

I certify that I served a copy of Appellant's Motion for Extension of Time on counsel of record in
this matter by depositing a copy of it in the United States Mail, postage prepaid, on September 4,
2015, addressed as follows:

William O. Pressley, Jr., Esq.
P.O. Box 1655
Spartanburg, SC 29304

September 4, 2015



Gary W. Poliakov (S.C. Bar #4488)
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Attorney for Appellant

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Bernard B. Poliakoff
(1916-1955)

J. Manning Poliakoff
(1923-1949)

Matthew Poliakoff
(1919-1979)

September 4, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Re: Peggy Ineta Whittenberg, Individually and as Personal Representative of the Estates of Lucille W. Littlejohn, deceased, and Alfred R. Littlejohn, deceased, Appellant v. Rayford Camp, Individually and as Personal Representative of the Estate of J.A. Littlejohn, deceased; Kathy Byers, Nolan Richmond, Jr.; John Thomas Littlejohn, Jr.; Quinton Littlejohn; and Zandy Fay Jeffries Boyce, Respondent, Case No. 2013-CP-11-0373

Dear Ms. Kitchings:

Enclosed for filing is original and six copies of Appellant's Motion for Extension of Time, Affidavit of Counsel and Proof of Service in the above matter. I also enclose our check for \$25.00 representing the filing fee. Please return the clocked copies in the postage paid envelope provided.

By copy of this letter I am serving a copy of the motion on William O. Pressley, Jr., Esq.

With best regards, I am

Yours very truly,

A handwritten signature in black ink that reads "Gary W. Poliakoff". The signature is written in a cursive style with a large initial "G".

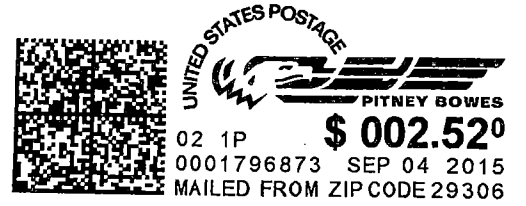
Gary W. Poliakoff


GWP/tjd

Enclosures

cc: William O. Pressley, Esq. (with enclosures)

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