

RECEIVED

DEC 16 2015

THE STATE OF SOUTH CAROLINA

SC Court of Appeals

In the Court of Appeals

File No. 2015 00 1752

APPEAL FROM THE CHARLESTON COUNTY

COURT OF COMMON PLEAS

J.C. Nicholson, Jr., Circuit Court Judge

Stephanie P. McDonald, Circuit Court Judge at Trial

Case No. 2012-CP-3421

MAMIE F. NICHOLS,

APPELLANT,

VERSUS

AL THADDEUS THOMPSON,

TITUS SHEROD THOMPSON and

ASIA RACHAL THOMPSON

RESPONDENTS.

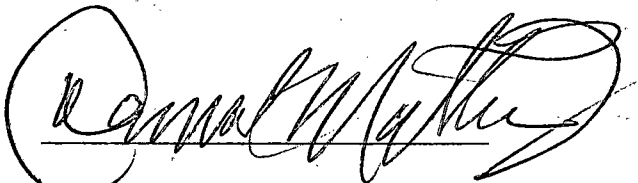
AFFIDAVIT OF RESPONDENTS FOR EXTENSION OF TIME

PERSONALLY appeared before me DEMAL I. MATTSON, JR., the attorney for the respondents in the above referenced matter, upon being duly sworn, deposes and says unto this Honorable Court:

1. I am the Attorney for the Respondents in this matter.

2. I did not receive the Appellate's Motion entitled Opposition to Motion To Dismiss Appeal until December 4, 2015, which was addressed to my old address of 900 Bowman Road, Suite 200, Mt. Pleasant, SC 29464. I never received the one allegedly sent to my new address as of August 1, 2015 at 804 St. Dennis Drive, Charleston, SC 29407.
3. On December 4, 2015 I immediately sent an email to Appellate's Attorney advising her of this fact and she informed me she sent the document to both addresses. I then emailed her on December 7, 2015 explaining her that the one sent to the address of St. Dennis Drive was never received and on the same day she objected to the extension.
4. Approximately a month and a half ago I had orthoscopic surgery on my right knee due to an accident and the surgery to date has not been successful. I have had four post-surgical injections. During a discussion with the surgeon yesterday, I was informed I may have to have a complete knee replacement. The injury is very painful at the present time.
5. I am hereby requesting an Extension of Time until January 4, 2016 to present my Reply to Appellate's Opposition To Motion To Dismiss.
6. A copy of correspondence with opposing counsel is attached hereto.

FURTHER AFFIANT SAITH NOT.

A handwritten signature in cursive script, appearing to read "Demal I. Mattson, Jr.", is written over a horizontal line. The signature is enclosed within a hand-drawn circle.

DEMAL I. MATTSON, JR.

SWORN TO BEFORE ME THIS

11 DAY OF DECEMBER, 2015.

Yvonne C. Patton

NOTARY PUBLIC FOR S.C.

MY COMMISSION EXPIRES: 03 03 2018

—Original Message—

From: Precious Felder, Esq. <pflawoffices@gmail.com>

To: DEMAL I. MATTSON, JR., ATTORNEY AT LAW <dmattson52@aol.com>

Sent: Fri, Dec 4, 2015 7:10 pm

Subject: Re: OPPOSITION TO MOTION TO DISMISS APPEAL RE. NICHOLS VS THOMPSON

Attorney Mattson,

As a courtesy, Appellant's opposition was sent to both addresses. Thus, I have made no error and you would be making a misrepresentation to the court. I will respond to your request accordingly.

Regards,

Precious Felder, Esq.

The Law Offices of Precious Felder, LLC

1800 Peachtree St. NW Suite 809

Atlanta, GA 30309

Office: (404) 478-7207

Fax: (404) 596-8001

pflawoffices@gmail.com

www.pf-lawllc.com

On Dec 4, 2015, at 3:55 PM, DEMAL I. MATTSON, JR., ATTORNEY AT LAW
<dmattson52@aol.com> wrote:

PRECIOUS
MY OFFICE NOTIFIED YOU I WAS MOVING MY OFFICE ON SEPT. 1
2015.
IT CONTAINED MY NEW ADDRESS. WHEN YOU MAILED YOUR
INITIAL
BRIEF YOU SENT IT TO BOTH MY OLD ADDRESS AND MY NEW
ADDRESS.

FOR SOME UNKNOWN REASON WHEN YOU MAILED YOUR
OPPOSITION TO
MOTION TO DISMISS YOU SENT IT ONLY TO MY OLD ADDRESS.

I DID NOT RECEIVE YOUR MAIL UNTIL UNTIL TODAY WHEN I
RECEIVED
A CALL FROM THE MAIL ROOM OF MY OLD OFFICE THAT I HAD
SOME
MAIL. I IMMEDIATELY PICKED IT UP AND FOUND YOUR
MISADDRESSED
CORRESPONDENCE TO ME.

I WILL BE NOTIFYING THE CLERK OF COURT OF APPEALS OF
YOUR ERROR
AND REQUESTING UNTIL 12/23/15 TO RESPOND.

I DO NOT COMPREHEND YOUR ERROR BECAUSE MY MOTION TO
DISMISS
HAD MY NEW CORRECT ADDRESS ON THE LETTER HEAD AND

UNDER MY
SIGNATURE LINES.

SINCERELY

Demal I. Mattson, Jr.
Attorney at Law
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Charleston, SC 29407
(843) 881-2334 phone
(843) 881-2992 fax
(843) 442-3839 cell
DMattson52@aol.com
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AL THADDEUS THOMPSON,

TITUS SHEROD THOMPSON and

ASIA RACHAL THOMPSON

RESPONDENTS.

CERTIFICATE OF SERVICE BY MAIL

I certify that, on this date, I served a copy of the following:

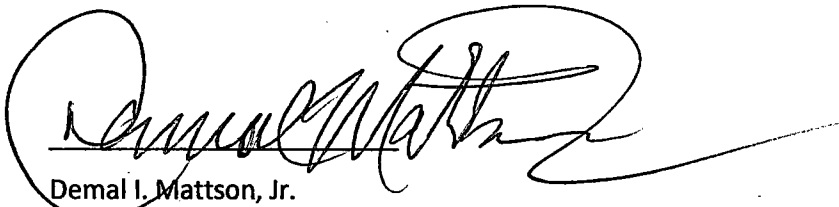
AFFIDAVIT OF RESPONDENTS FOR EXTENSION OF TIME WITH SUPPORTING
ENCLOSURES; AND MOTION FOR EXTENSION OF TIME BY RESPONDENTS by mailing

to:

Precious Felder, Esquire
Attorney at Law
1800 Peachtree St. NW
Suite 809
Atlanta, GA 30309

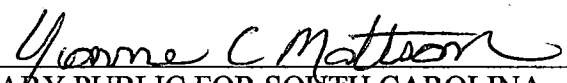
depositing in the U.S. Mail, in an envelope, with sufficient postage affixed, thereto.

DATED THIS 11 DAY OF DECEMBER, 2015.



Demal I. Mattson, Jr.
Attorney for the Respondents

SWORN TO BEFORE ME THIS 11 DAY OF
DECEMBER, 2015


NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 03 03 2018
