

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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-10-3421

RECEIVED
DEC 29 2015
SC Court of Appeals

Mamie F. Nichols,

Appellant,

v.

ALBERT NAPOLEON THOMPSON, JR.,
AL THADDEUS THOMPSON,
TITUS SHEROD THOMPSON, and ASIA RACHAL THOMPSON,

Respondent.

OPPOSITION TO MOTION FOR EXTENSION OF TIME BY RESPONDENTS

PRECIOUS FELDER
1800 Peachtree St., Suite 809
Atlanta, GA 30309
(404) 478-7207
Attorney for Appellant (Pro Hac Vice)
State Bar Number 648264

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Respondents.

DECLARATION IN OPPOSITION TO MOTION FOR
EXTENSION OF TIME BY RESPONDENTS

PRECIOUS FELDER declares that the following statements are true under the penalties
of perjury:

1. I am the attorney for the Appellant and make this declaration in opposition to the motion of the Respondents for an extension of time to reply to the Appellant's return to Respondent's motion to dismiss appeal, purportedly for failure to receive a mailed copy of the

return at Counsel's home address when the Counsel admits receipt of the return at his address of record, which is 1156 Bowman Road, Suite 200, Mt. Pleasant, South Carolina 29464. The motion is frivolous within the meaning of Rule 269 and should be denied.

2. Contrary to the Respondents' argument, the Appellant's return, entitled Opposition to Motion to Dismiss Appeal, was timely mailed within 10 days from the date of service with a certificate of service (Rule 240(c)(1)) to the Respondents' attorney of record, Demal I. Mattson, Jr. at the address of record of 1156 Bowman Road, Suite 200, Mt. Pleasant, South Carolina 29464 and to counsel's home address of 804 St. Dennis Drive, Charleston, South Carolina 29407. The Appellant's Certificate of Service is matter of public record.

3. Counsel supplies no precedent for the relief sought. Demal I. Mattson, Jr. admits receipt of the Appellant's return to Respondent's motion to dismiss appeal, and he cites no authority or rule for any relief due to his present, personal and medical condition or physical incompetency to delay the appeal.

Accordingly, the motion should be denied, in all respects, and the Court should consider whether a Rule 269 sanction is in order.

Declared to be true under the penalties of perjury on December 21, 2015.


PRECIOUS FELDER

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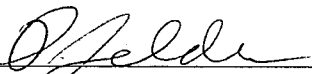
ALBERT NAPOLEON THOMPSON, JR.,
AL THADDEUS THOMPSON,
TITUS SHEROD THOMPSON, and ASIA RACHAL THOMPSON,

Respondents.

CERTIFICATE OF SERVICE

I certify that I have served Opposition to Motion for Extension of Time by Respondents on Albert Napoleon Thompson, Jr., Al Thaddeus Thompson, Titus Sherod Thompson and Asia Rachal Thompson by depositing a copy of it in the United States Mail on December 21, 2015, to their attorney of record, Demal I. Mattson, Jr. at 1156 Bowman Road, Suite 200, Mt. Pleasant, South Carolina 29464 and 804 St. Dennis Drive, Charleston 29407.

December 21, 2015


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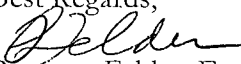
Clerk of Court
The South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Mamie F. Nichols v. Albert N. Thompson
Appellate Case No. 2015-001752

Dear Clerk of Court:

You may find enclosed the original and one copy of Opposition to Motion for Extension of Time by Respondents. Please mail the filed copy within the enclosed postage stamped envelope.

Thank you.

Best Regards,

Precious Felder, Esq.

Enclosures
cc: Demal I. Mattson, Jr., Esq

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PRECIOUS FELDER, LLC
1800 Peachtree St. Suite 809
Atlanta, GA 30309

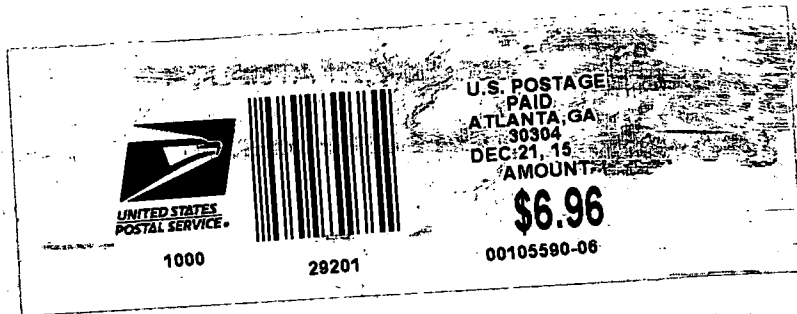
7015 1730 0002 0053 8572

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL®



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