

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 01 2016

SC Court of Appeals

79127

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2013-CP-22-001231

MELANIE J. NEWMAN, MELISSA J. ARCE, WINONA M. NEWMAN,
AND CHRISTOPHER J. NEWMAN..... Appellants

vs.

VIRGINIA K. NEWMAN, INDIVIDUALLY AND VIRGINIA K. NEWMAN,
AS PERSONAL REPRESENTATIVES OF THE ESTATE OF
JOHN PERCY NEWMAN..... Respondents

IN RE: ESTATE OF JOHN PERCY NEWMAN

And

VIRGINIA K. NEWMAN, INDIVIDUALLY AND VIRGINIA K. NEWMAN,
AS PERSONAL REPRESENTATIVE OF THE ESTATE OF
JOHN PERCY NEWMAN..... Respondents

vs.

MELANIE J. NEWMAN, MELISSA J. ARCE, WINONA M. NEWMAN,
AND CHRISTOPHER J. NEWMAN..... Appellants

IN RE: ESTATE OF JOHN PERCY NEWMAN

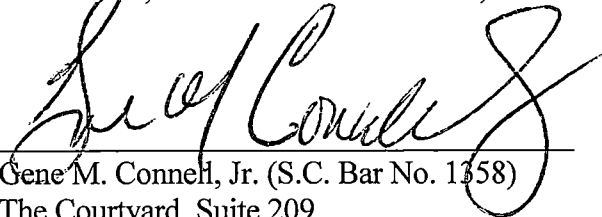
MOTION TO EXTEND TIME TO FILE APPELLANTS'
INITIAL BRIEF AND DESIGNATION OF MATTER

YOU WILL PLEASE TAKE NOTICE that the undersigned, as counsel for the
Appellants, moves this Court for an Order extending the time to file Appellants' Initial Brief
and Designation of Matter in the captioned case. The basis of this motion is that this matter

involves a complicated and complex probate matter and that the parties have been discussing settlement for the last three weeks which have involved meetings between the lawyers, review of plats, discussion of interest and heirs' property and other related settlement issues, all of which have precluded Appellants and Respondent from moving forward with preparing their respective briefs. Appellants remain optimistic that the case may in fact be settled, and if it is settled, it will have to be remanded to the Probate Court for approval. If it is not settled, then Appellants respectfully request this Court allow them until May 1, 2016 to file their Initial Brief and Designation of Matter.

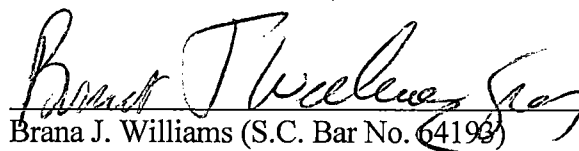
Accordingly, Appellants, with consent of Respondent's counsel, hereby move the Court for additional time to either prepare Appellants' Initial Brief and Designation of Matter, or in the alternative, to reach a full and final settlement of the matters in this case. Appellants respectfully request that they be given until May 1, 2016 to file Appellants' Initial Brief and Designation of Matter. Appellants are aware this is an unusual request; however, Appellants remain optimistic that a settlement might be possible which would preclude the Court from deciding significant, complex issues which are part and parcel of the appeal of this case

KELAHER, CONNELL & CONNOR, P.C.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
(843) 238-5050 (facsimile)
gconnell@classactlaw.net

WILLIAMS LAW FIRM, LLC

A handwritten signature in cursive script, appearing to read "Brana J. Williams".

Brana J. Williams (S.C. Bar No. 64193)

The Courtyard, Suite 102
1500 U.S. Highway 17 North
Surfside Beach, SC 29575
(843) 357-5100

March 30, 2016
Surfside Beach, South Carolina

Attorneys for Appellants

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Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2013-CP-22-001231

MELANIE J. NEWMAN, MELISSA J. ARCE, WINONA M. NEWMAN,
AND CHRISTOPHER J. NEWMAN..... Appellants

vs.

VIRGINIA K. NEWMAN, INDIVIDUALLY AND VIRGINIA K. NEWMAN,
AS PERSONAL REPRESENTATIVES OF THE ESTATE OF
JOHN PERCY NEWMAN..... Respondent

IN RE: ESTATE OF JOHN PERCY NEWMAN

And

VIRGINIA K. NEWMAN, INDIVIDUALLY AND VIRGINIA K. NEWMAN,
AS PERSONAL REPRESENTATIVES OF THE ESTATE OF
JOHN PERCY NEWMAN..... Respondent

vs.

MELANIE J. NEWMAN, MELISSA J. ARCE, WINONA M. NEWMAN,
AND CHRISTOPHER J. NEWMAN..... Appellants

IN RE: ESTATE OF JOHN PERCY NEWMAN


PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served a **Motion to Extend Time to File Appellants'**

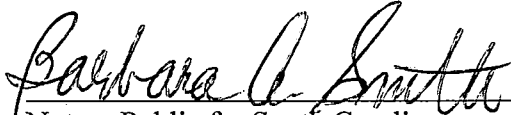
Initial Brief and Designation of Matter on the Respondent, through her attorney of record,
by depositing a copy of same in the United States Mail, postage prepaid, to:

Charles O. Nation, II, Esquire
NATION LAW FIRM
Post Office Drawer 1657
Georgetown, SC 29442

DATE OF MAILING: March 30, 2016


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 30 day of March, 2016.


Notary Public for South Carolina
My Commission Expires: 3/12/24

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW
SUITE 209
THE COURTYARD
1500 U.S. HIGHWAY 17 NORTH
P.O. DRAWER 14547
SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS

* OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

March 30, 2016

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SC Court of Appeals

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appellate Case No. 2015-000873

*Melanie J. Newman, Melissa J. Arce, Winona M. Newman and Christopher J. Newman In
Re: Estate of John Percy Newman vs. Virginia K. Newman, Individually and Virginia K.
Newman, As Personal Representatives of The Estate Of John Percy Newman*

AND

*Virginia K. Newman, Individually and Virginia K. Newman, As Personal Representatives of
The Estate Of John Percy Newman V. Melanie J. Newman, Melissa J. Arce, Winona M.
Newman and Christopher J. Newman In Re: Estate of John Percy Newman*

Case No. 2013-CP-22-1231

Our File No. 2015-105-C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion to Extend Time to File Appellants' Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,

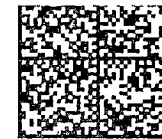


Gene M. Connell, Jr.

GMC,Jr.:sm

Enclosures

cc with enc.: Charles O. Nation, II, Esquire
Brana J. Williams, Esquire



UNIT 7
PITNEY BOWES
02 1P \$ 002.52⁰
0001943660 MAR 30 2016
MAILED FROM ZIP CODE 29575

KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 14547
SURFSIDE BEACH, SOUTH CAROLINA 29587

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