

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Civil Action No.: 2010-CP-30-0116

Willie D. Watson,.....Appellant.

v.

Nancy Carol Underwood, individually and as putative trustee of the Willie D. Watson Trust; John H. Watson, individually and as putative trustee of the Willie D. Watson Trust; and Future and Potential Heirs of Willie D. Watson;.....Respondents

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF**

Appellant hereby moves for an additional thirty (30) days in which to file its Initial Brief that is currently due September 24, 2012. This motion is based on the relative complexity of the issues on appeal that are involved in this case around an active trial schedule including multiple other appellate briefs being due in the next month.



T. Jeff Goodwyn, Jr., Esquire
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, South Carolina 29205
(803) 251-4517
JGoodwyn@Goodwynlaw.com
Attorney for Appellant

September 17, 2012

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SC Court of Appeals

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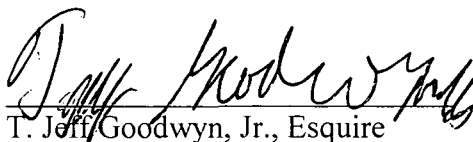
v.

Nancy Carol Underwood, individually and as putative trustee of the
Willie D. Watson Trust; John H. Watson, individually and as putative
trustee of the Willie D. Watson Trust; and Potential Heirs of Willie D.
Watson,.....Respondents.

PROOF OF SERVICE

I certify that I have served the **Appellant's Motion for Extension of Time to File Initial Brief** on B. Michael Brackett, Esquire, Counsel for the Respondents at the address below by depositing a copy of same in the United States Mail, postage prepaid, on September 17, 2012.

B. Michael Brackett, Esquire
Moses, Koon & Brackett, PC
P.O. Box 100261
Columbia, SC 29202-3261



T. Jeff Goodwyn, Jr., Esquire
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, South Carolina 29205
(803) 251-4517
(803) 251-4527 (fax)
JGoodwyn@Goodwynlaw.co
Attorney for Appellant

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GOODWYN LAW FIRM, LLC

T. JEFF GOODWYN, JR.
ATTORNEY AT LAW

2519 Devine Street,
Suite A
Columbia, South Carolina 29205

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

Tel. (803) 251-4517
Fax (803) 251-4527

*Also Licensed in Georgia

September 17, 2012

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

RE: *Willie D. Watson v. Nancy Carol Underwood, individually and as putative trustee of the Willie D. Watson Trust; John H. Watson, individually and as putative trustee of the Willie D. Watson Trust; and Future and Potential Heirs of Willie D. Watson*
Civil Action No.: 2010-CP-30-0116
Our File No.: 3500-0021

Dear Ms. Kitchings:

Our firm represents the Appellant, Willie D. Watson in regard to the above-referenced appeal. This letter is to request a thirty (30) day extension to file and serve Appellant's Initial Brief and Designation of Matter. By my calculations, the requested extension would give us until October 24, 2012 to file and serve our initial brief and designation. No previous extension has been requested.

Enclosed is our firm's check in the amount of \$25.00 for the required filing fee.

By copy of this letter, I am notifying counsel for the Respondents of our request for a thirty (30) day extension. Thank you for your assistance with this matter.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosure
cc: B. Michael Brackett, Esquire

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