

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2012-CP-10-6835

**RECEIVED**

APR 14 2017

SC Court of Appeals

Joanne S. Reed,..... Appellant,  
v.

Christina Salters, Wesley Salters, Lula Salters, Dorothy Salters, Josephine Salters, Harold Salters, Johnnie Salters, Lillian Sanders, Luchria Sanders, Mary Nelson, Martha Sanders, Ruthie Mae Sanders Butler, Elizabeth Sanders, George Grant, Olivia Heyward, Lisa Canady, Sylvia Grant Heyward, Janice Jones, Abraham Grant III, Sametta Heyward, Judy Heyward, Georgiana S. Stone, Sandra S. Brown, Carolyn S. Hissing, George Sanders, William Sanders, Peggy Ann Wright, Barbara S. Grampus, Evalina Middleton, John Sherman, Gertrude Townsend, Helen B. Townsend, Verta Lee Townsend, Vilma Townsend, Al Townsend, Hercules Townsend, Christina Townsend, Sherel Townsend, Dean Townsend, Linsey Townsend, Barbara Townsend, Darlene Townsend, Ann Townsend, Ronnie Townsend, Elizabeth Townsend, Jerome Townsend, Mose Middleton, Jr., Benjamin Middleton, Sr., Leroy Middleton, Samuel Middleton, Herman Middleton, Raymond Middleton, Rodell Middleton, Florence Middleton, Eliza Ann M. Jamison, Sadie Thornberg, Madlyn M. Lasley, Henry Middleton, Maybelle M. White, Catherine Middleton, Edie Middleton, Jesse James Middleton, Jr., Sam Smalls, Ella M. Smalls, Reless Bryant, Viola Townsend, Clara Grant, Lonnie Mae Bryant, Marion Smalls, John Bailey, Blanche Murphy Field, Charles Tyler, Margarete Brown, Banny Tyler, Joseph Tyler, Calvin Tyler, Willie Washington and John Doe and Mary Roe fictitious names representing unknown minors, incompetents, persons in the military service within the meaning of Title 50 United States Code, commonly referred to as The Service Members Civil Relief Act of 2003, persons imprisoned, and persons under any other legal disability and Richard Roe and Jane Doe, fictitious names representing unknown heirs, devisees, distributes, or personal representatives of the following deceased persons John Salters, Sarah S. Berin, John J. Salters, Viola Salters, James Salters, Eveline Sanders, Eddie Sanders, Henrietta Sanders Grant, Abraham Grant, Jr., Dorothy S. Heyward, Sam Heyward, George Leroy Sanders, Janie Sanders, Eliza S. Middleton, Victoria Taylor, Lou Bertha Ford, Eva M. Wheeling, William Middleton, Jr., Rebecca Sherman, Elizabeth Townsend Frazier, Leon Townsend, Jessie Townsend, Nathaniel Townsend, Moses Middleton, Jesse James Middleton, Clara S. Smalls, Robert Smalls, Charles Smalls, Joseph Smalls, Alfred Smalls, Sue Smalls, Mary Smalls Bryant, Sylvia Bryant, Richard Bryant, Albertha Anderson, Julia Bailey, Alonso Brown, Jr., Julia (Julia) Brown Carter, Edward Brown, Janie Brown, Cippio Bailey, Laura Baily, Florence Bailey, Elizabeth Murphy, James Murphy, Mary Salters and Helen Tyler, Defendants,

of Whom

Jesse Townsend, Jr. a/k/a Jessie M. Townsend, Jr. is the .....Respondent.

REQUEST FOR EXTENSION OF THIRTY DAYS


The undersigned does hereby request a 30 day extension to file the Respondent's Initial Brief and Respondent's Designation of Matter to be Included in the Record on Appeal. The undersigned had a triple by-pass at the end of November, 2016. Recovery has been slower than anticipated and I am not yet working full days. I am improving daily and expect to be at full strength shortly. Additionally, a part of my recovery, I have been going to cardiac rehabilitation 3 times a week which takes approximately 3 hours to travel to and from and do the workout. At times, I am able to return to work after the workout, however, at other times I am frankly exhausted and unable to work the rest of the afternoon.

I did not expect that it would take this long to recover and although I am doing much better, I am not 100% at this time. An extension of 30 days will allow me either to obtain another attorney to take over this case or I will be able to prepare and file the pleadings properly.

For the forgoing reasons, I request an extension to file the required documents or to bring in a new attorney who can take care of this matter.

Respectfully submitted,

April 7, 2017

  
\_\_\_\_\_  
D. Nathan Davis #1563  
Davis Law SC  
12 Carriage Lane, Ste. A  
Charleston, SC 29407  
843-571-4042          Office

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APR 14 2017

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2012-CP-10-6835

Joanne S. Reed,..... Appellant,  
v.

Christina Salters, Wesley Salters, Lula Salters, Dorothy Salters, Josephine Salters, Harold Salters, Johnnie Salters, Lillian Sanders, Luchria Sanders, Mary Nelson, Martha Sanders, Ruthie Mae Sanders Butler, Elizabeth Sanders, George Grant, Olivia Heyward, Lisa Canady, Sylvia Grant Heyward, Janice Jones, Abraham Grant III, Sametta Heyward, Judy Heyward, Georgiana S. Stone, Sandra S. Brown, Carolyn S. Hissing, George Sanders, William Sanders, Peggy Ann Wright, Barbara S. Grampus, Evalina Middleton, John Sherman, Gertrude Townsend, Helen B. Townsend, Verta Lee Townsend, Vilma Townsend, Al Townsend, Hercules Townsend, Christina Townsend, Sherel Townsend, Dean Townsend, Linsey Townsend, Barbara Townsend, Darlene Townsend, Ann Townsend, Ronnie Townsend, Elizabeth Townsend, Jerome Townsend, Mose Middleton, Jr., Benjamin Middleton, Sr., Leroy Middleton, Samuel Middleton, Herman Middleton, Raymond Middleton, Rodell Middleton, Florence Middleton, Eliza Ann M. Jamison, Sadie Thornberg, Madlyn M. Lasley, Henry Middleton, Maybelle M. White, Catherine Middleton, Edie Middleton, Jesse James Middleton, Jr., Sam Smalls, Ella M. Smalls, Reless Bryant, Viola Townsend, Clara Grant, Lonnie Mae Bryant, Marion Smalls, John Bailey, Blanche Murphy Field, Charles Tyler, Margarete Brown, Banny Tyler, Joseph Tyler, Calvin Tyler, Willie Washington and John Doe and Mary Roe fictitious names representing unknown minors, incompetents, persons in the military service within the meaning of Title 50 United States Code, commonly referred to as The Service Members Civil Relief Act of 2003, persons imprisoned, and persons under any other legal disability and Richard Roe and Jane Doe, fictitious names representing unknown heirs, devisees, distributees, or personal representatives of the following deceased persons John Salters, Sarah S. Berin, John J. Salters, Viola Salters, James Salters, Eveline Sanders, Eddie Sanders, Henrietta Sanders Grant, Abraham Grant, Jr., Dorothy S. Heyward, Sam Heyward, George Leroy Sanders, Janie Sanders, Eliza S. Middleton, Victoria Taylor, Lou Bertha Ford, Eva M. Wheeling, William Middleton, Jr., Rebecca Sherman, Elizabeth Townsend Frazier, Leon Townsend, Jessie Townsend, Nathaniel Townsend, Moses Middleton, Jesse James Middleton, Clara S. Smalls, Robert Smalls, Charles Smalls, Joseph Smalls, Alfred Smalls, Sue Smalls, Mary Smalls Bryant, Sylvia Bryant, Richard Bryant, Albertha Anderson, Julia Bailey, Alonso Brown, Jr., Julia (Julia) Brown Carter, Edward Brown, Janie Brown, Cippio Bailey, Laura Baily, Florence Bailey, Elizabeth Murphy, James Murphy, Mary Salters and Helen Tyler, Defendants,

J

of Whom

Jesse Townsend, Jr. a/k/a Jessie M. Townsend, Jr. is the .....Respondent.

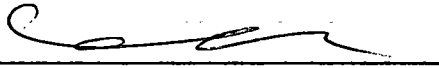
---

PROOF OF SERVICE

---

The undersigned hereby certifies that a true copy of Respondent' Request for a 30 Day extension has been served upon Maria Kiehling Brees, 105 Wappoo Creek Drive, Suite 1-B, Charleston, SC 29412 and upon Kelvin M. Huger, Esq. 27 Gamecock Avenue, #200, Charleston, SC 29407, by United States Mail, first class, postage prepaid on the 7<sup>th</sup> day of April, 2017.

April 7, 2017



---

D. Nathan Davis #1563  
Davis Law SC  
12 Carriage Lane, Ste. A  
Charleston, SC 29407  
843-571-4042            Office

Davis Law SC  
12 Carriage Lane, Ste  
Charleston, SC 29407



02 1P  
0000846912 MAR 24 2017  
MAILED FROM ZIP CODE 29407  
**\$ 000.46<sup>0</sup>**

**RECEIVED**

APR 14 2017

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of  
Appeals  
PO Box 11629  
Columbia, SC 29211

2921181629 8012

