

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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AUG 16 2017

SC Court of Appeals

APPEAL FROM CHEROKEE COUNTY  
Court of Common Pleas  
The Honorable Gordon G. Cooper, Master-in-Equity

Case No: 2015-CP-11-0319  
Appellate Case No.: 2017-001459

Brenda Halsey, Bernay F. Halsey, Jr., Demont Halsey,  
Fredericka Halsey and Brittany Halsey,

Appellants,

v.

Gwendollette Halsey Simmons, Kenneth Wayne Oglesby,  
Roderick Terrill Oglesby, any heir of the Roderick Gaffney  
Estate, known or unknown, who may claim any interest  
in the subject property, and any unknown heirs or parties  
who may claim title or ownership in the real estate which  
is the subject of this action, Elijah Redish, Jackie W.  
Williams, as Cherokee County Treasurer, or the Successor  
in Office, Vernon L. Price, as Delinquent Tax Collector of  
Cherokee County, or the Successor in Office,

Respondents,

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF

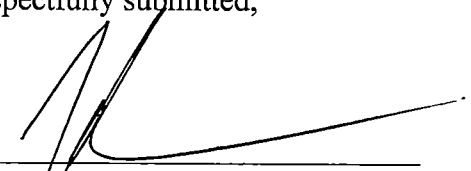
Respondent Jackie W. Williams, as Cherokee County Treasurer, or the Successor in  
Office, Vernon L. Price, as Delinquent Tax Collector of Cherokee County, or the Successor in  
Office respectfully moves before the Court for an extension of time in which to file  
Respondent's Initial Brief. Respondent Redish was previously granted an extension to file his  
Initial Brief, and the Respondent Jackie W. Williams, as Cherokee County Treasurer, or the  
Successor in Office, Vernon L. Price, as Delinquent Tax Collector of Cherokee County, or the



Successor in Office will be working in concert with Respondent Redish to file an Initial Brief.

This motion is submitted in good faith and is not intended to delay this matter. The Respondent requests an extension until September 30, 2017.

Respectfully submitted,



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Joseph L. V. Johnson  
Joseph L. Mathis  
Saint-Amand, Thompson & Mathis, LLC  
210 South Limestone Street, Suite 1  
Gaffney, South Carolina 29340  
Tel: 864-489-6052  
Fax: 864-489-5406

August 11, 2017  
Gaffney, South Carolina

Attorneys for Respondent Jackie W.  
Williams, as Cherokee County Treasurer, or  
the Successor in Office, Vernon L. Price, as  
Delinquent Tax Collector of Cherokee  
County, or the Successor in Office

Other Counsels of Record:

Anna-Karina Parker  
Attorney for Gwendolette Halsey Simmons  
221 E. Floyd Baker Blvd.  
Gaffney, SC 29340

George Brandt III  
Attorney for Elijah Redish  
360 E. Henry St.  
Spartanburg, SC 29302

Richard Rhodes  
Attorney for Appellant  
260 North Church Street  
Spartanburg, SC 29306

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Fredericka Halsey and Brittany Halsey,

Appellants,

v.

Gwendolette Halsey Simmons, Kenneth Wayne Oglesby,  
Roderick Terrill Oglesby, any heir of the Roderick Gaffney  
Estate, known or unknown, who may claim any interest  
in the subject property, and any unknown heirs or parties  
who may claim title or ownership in the real estate which  
is the subject of this action, Elijah Redish, Jackie W.  
Williams, as Cherokee County Treasurer, or the Successor  
in Office, Vernon L. Price, as Delinquent Tax Collector of  
Cherokee County, or the Successor in Office,

Respondents,

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PROOF OF SERVICE

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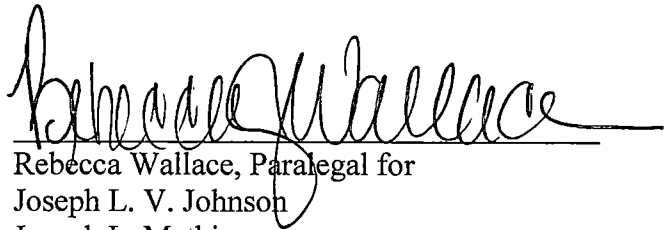
I certify that I have served a copy of the MOTION FOR EXTENSION OF TIME TO  
FILE RESPONDENT'S INITIAL BRIEF on August 11, 2017 by depositing a copy of the same  
into the US Mail, postage prepaid to the following:

Anna-Karina Parker  
Attorney for Gwendolette Halsey Simmons  
221 E. Floyd Baker Blvd.  
Gaffney, SC 29340

George Brandt III  
Attorney for Elijah Redish  
360 E. Henry St.  
Spartanburg, SC 29302

Richard Rhodes  
Attorney for Appellant  
260 North Church Street  
Spartanburg, SC 29306

Respectfully submitted this the 11<sup>th</sup> day of August, 2017.

A handwritten signature in black ink, appearing to read "Rebecca Wallace", written over a horizontal line.

Rebecca Wallace, Paralegal for  
Joseph L. V. Johnson  
Joseph L. Mathis  
Saint-Amand, Thompson & Mathis, LLC  
210 S. Limestone Street, Suite 1  
Gaffney, SC 29340-3014  
Phone: (864) 489-6052  
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Attorneys for Respondent Jackie W. Williams, as  
Cherokee County Treasurer, or the Successor in  
Office, Vernon L. Price, as Delinquent Tax  
Collector of Cherokee County, or the Successor in  
Office

**SAINT-AMAND, THOMPSON & MATHIS, L.L.C.**

*Attorneys At Law*

JAMES R. THOMPSON  
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C. EMILE SAINT-AMAND  
(1907-1992)

August 11, 2017

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AUG 16 2017

SC Court of Appeals

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

Re: Brenda Halsey, et al, vs. Gwendolette Halsey Simmons, et al.  
Appellate Case No: 2017-001459

Dear Clerk:

Please be advised that our firm represents Respondent Jackie W. Williams, as Cherokee County Treasurer, or the Successor in Office, Vernon L. Price, as Delinquent Tax Collector of Cherokee County, or the Successor in Office. Enclosed, please find one (1) original and six (6) copies of our Motion for Extension of Time, along with a Proof of Service of the same. Also, enclosed please find our firm's check in the amount of \$25.00, representing the filing fee.

Please return a filed copy of the Proof of Service to my office via the self-addressed stamped envelope. Should you need anything further, please do not hesitate to contact me.

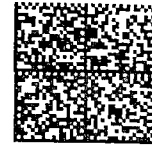
Sincerely,

  
Joseph L.V. Johnson

JLVJ/jj

enclosures

cc: Richard Rhodes (via mail)  
Anna-Karina Parker (via mail)  
George Brandt, III (via mail)



US POSTAGE

\$01.82<sup>9</sup>

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SAINT-AMAND, THOMPSON & MATHIS, L.L.C.

*Attorneys At Law*

210 SOUTH LIMESTONE STREET, SUITE 1  
GAFFNEY, SOUTH CAROLINA 29340-3014

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