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THE STATE OF SOUTH CAROLINA
In the Court of Appeals
APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas
Carmen T. Mullen
Circuit Court Judge

RECEIVED
SEP 25 2017
SC Court of Appeals

Case No. 2014-CP-07-02268

Appellate Case No. 2017-000685

BARBARA AIMAR GOODWIN, f/k/a BARBARA A. GILLEY, Appellant,

vs.

RONALD L. ROSSETTI, Individually, and as Trustee of the RONALD L. ROSSETTI TRUST-1989, LINDA A. ROSSETTI, as Trustee of the RONALD L. ROSSETTI TRUST, the RONALD L. ROSSETTI TRUST, CHRISTOPHER T. GODLEY and JADE GODLEY, Respondents.

NOTICE AND MOTION TO EXTEND TIME

To Serve and File the Appellants' Initial Brief
and Designation of Matter To Be Included in the Record on Appeal

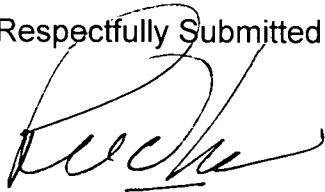
The Appellant, by and through her undersigned attorney, pursuant to Rule 240, SCACR, moves the Court of Appeals for an order extending the time for the Appellant to file and serve her Initial Brief and Designation of Matter to Be Included in the Record on Appeal, for thirty (30) days, through and including October 23, 2017, upon the grounds that settlement negotiations with respect to the entire case are ongoing, with the Appellant and two of the Respondents having already agreed to terms, and with the same proposal still under review by the remaining Respondents. The extension sought allows sufficient time for the settlement to be concluded or for the Appellant's brief and designation to be completed and filed.

✓

The Appellant is informed and believes that the Respondents do not oppose this Motion.

Two previous extensions of time has been sought by the Appellant.

Respectfully Submitted,

By: 
Robert V. Mathison, Jr.
S.C. Bar No. 3685

Attorney for the Appellant
Barbara Aimar Goodwin

MATHISON & MATHISON
Post Office Box 5271
Hilton Head Island
South Carolina 29938-5271
Telephone: (843) 785-6503
Email: rmathlaw@aol.com

September 22, 2017

Hilton Head Island, South Carolina.

MEMORANDUM

The relief requested in the motion set forth above is authorized by Rule 240, SCACR.

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AFFIDAVIT
(ROBERT V. MATHISON, JR.)

PERSONALLY appeared before me Robert V. Mathison, Jr. (herein sometimes "the Affiant"), who, first being duly sworn, says the following:

1. My name is Robert V. Mathison, Jr., and I am an attorney licensed to practice law by the State of South Carolina.
2. I am the attorney for the Appellant in this matter, and I reside at Hilton Head Island in Beaufort County, South Carolina.
3. I am 70 years of age, of sound mind, and I make this Affidavit of my own personal knowledge.

4. The negotiation of a global settlement in this case has been ongoing for a period exceeding three weeks. The Appellant and the Respondents Chris Godley and Jade Godley have agreed on terms, subject to the participation in the settlement by the Rossetti Respondents, whose insurance carrier has the pending proposal under review.

5. It is in the interest of justice that the settlement be consummated, if possible, as well as in the interest of judicial economy to allow time for the resolution of the case.

6. In the event that a full settlement is not achieved, the Appellant's Brief and Designation of Matter can and will be completed and filed within the thirty day extension of time requested.

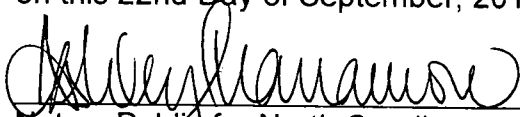
7. Two previous extensions have been sought, and the Affiant is informed and believe that the Respondents do not oppose this motion.

FURTHER THE AFFIANT SAYETH NOT.



Robert V. Mathison, Jr.
S.C. Bar No. 3685

SWORN to and Subscribed before me
on this 22nd Day of September, 2017.

 (SEAL)
Notary Public for North Carolina
My Commission Expires: 7-24-19

Ashley T. Narramore
Notary Public
Buncombe County, NC

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PROOF OF SERVICE

I, Robert V. Mathison, Jr., hereby certify that, on September 22, 2017, I filed and served by mail the original and copies of the Appellant's Notice and Motion to Extend Time dated September 22, 2017, by depositing same, with sufficient first class postage prepaid, at the United States Post Office at Asheville, North Carolina, addressed as follows:

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

George H. O'Kelley, Jr., Esquire
Attorney at Law
Post Office Box 1072
Beaufort, South Carolina 29901

William A. Bryan, Jr., Esquire
Collins & Lacy, PC
11945 Grandhaven Drive, Suite D
Murrells Inlet, South Carolina 29576

By: 

Robert V. Mathison, Jr
S.C. Bar No. 3685
Attorney for the Appellant
Barbara A. Goodwin

MATHISON & MATHISON
Post Office Box 5271
Hilton Head Island, SC 29938
Telephone: (843) 785-6503
Email: rmathlaw@aol.com

September 22, 2017

Hilton Head Island, South Carolina.

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September 22, 2017

The Honorable Jenny Abbott Kitchings
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Post Office Box 11629
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Re: Barbara Aimar Goodwin, etc. v. Ronald L. Rossetti, et al.
Case No. 2014-CP-07-02268
Appellate Case No. 2017-000685

Dear Ms. Kitchings:

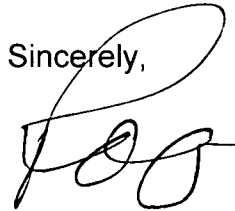
Enclosed for filing in this case are the following items:

1. The original and six copies of a Motion to Extend Time with respect to the filing of the Appellant's Initial Brief and Designation of Matter;
2. The original and six copies of the Affidavit of R.V. Mathison, Jr., in support of the motion; and
3. The original Proof of Service for each of the foregoing documents.

Also enclosed is my check in the amount of \$25.00 to pay the motion filing fee.

With kind regards, I am

Sincerely,



Robert V. Mathison, Jr.
S.C. Bar No. 3685

cc: George H. O'Kelley, Jr. Esquire
William A. Bryan, Jr., Esquire
Mrs. Barbara A. Goodwin