

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

**RECEIVED**

SEP 27 2017

SC Court of Appeals

September 25, 2017

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

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:

Please be advised that, after I had mailed the Appellant's Motion to Extend Time last Friday, September 22, 2017, at 5:31 p.m. on that date, I received an email from the Office of William Bryan, the attorney for several of the Respondents, with an attached letter from him, stating that he would not consent to the motion. Please see Exhibits A and B, which are enclosed.

I had on September 21, 2017, had a pleasant telephone conversation with Mr. Bryan about the proposed settlement, which he agreed to present to his clients' insurance carrier, at which time I told him that I planned to move for the extension, in part to allow the carrier time to consider it. I later confirmed that conversation by email with counsel for the Godley Respondents, George O'Kelley, Jr., as well as with Mr. Bryan. Exhibit C.

Mr. O'Kelley's clients were already amenable to the global settlement, and he subsequently emailed a timely confirmation that they would not oppose the motion. Exhibit D.

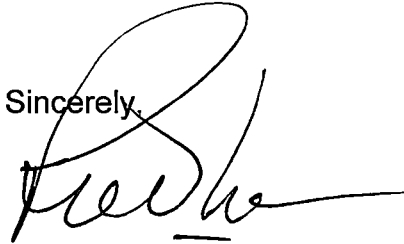
I believe that this sequence of events should be submitted to supplement the motion heretofore filed by the Appellant.

[Signature and Acknowledgment are on Page 2.]

The Honorable Jenny Abbott Kitchings  
September 25, 2017  
Page 2

With kind regards, I am

Sincerely,

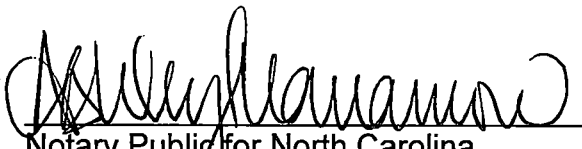


Robert V. Mathison, Jr.  
S.C. Bar No. 3685

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

SWORN to and Subscribed before me  
on this 25<sup>th</sup> Day of September, 2017.

Ashley T. Narramore  
Notary Public  
Buncombe County, NC

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

**From:** Angela C. Gonzalez <agonzalez@collinsandlacy.com>

**To:** 'rmathlaw@aol.com' <rmathlaw@aol.com>

**Cc:** 'golaw@hargray.com' <golaw@hargray.com>

**Subject:** Goodwin v. Rossetti C&L File No.: 1-2234

**Date:** Fri, Sep 22, 2017 5:31 pm

**Attachments:** Mathison (settlement) 9.22.17.pdf (30K)

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Mr. Mathison:

Please find attached correspondence from Mr. Bryan.

Thank you.

**Angela C. Gonzalez**

Legal Secretary

Direct: (843) 353-2333

Main: (843) 353-2350

Fax: (843) 353-2351

Vcard: [download vcard](#)

Web: [www.collinsandlacy.com](http://www.collinsandlacy.com)

11945 Grandhaven Drive Suite D

Murrells Inlet, SC 29576

(#)



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EXHIBIT A

William A. Bryan, Jr. | D: 843.353.2330 | E: [wbryan@collinsandlacy.com](mailto:wbryan@collinsandlacy.com)

September 22, 2017

VIA EMAIL: [rmathlaw@aol.com](mailto:rmathlaw@aol.com)

Robert V. Mathison, Jr., Esquire  
Mathison & Mathison  
Post Office Box 5271  
Hilton Head Island, SC 29938

Re: Barbara Aimar Goodwin, f/k/a Gilley v. 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  
Civil Action No.: 2014-CP-07-2268  
C&L No.: 1-2234

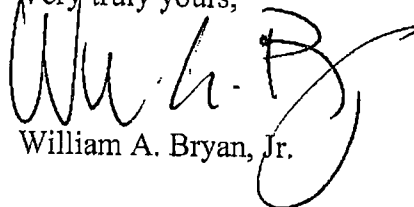
Dear Mr. Mathison:

I have discussed Plaintiff's proposal with my clients and they are not interested in settlement.

As a result, there is no need for a further extension of the deadline to file Appellant's Initial Brief and Designation of Matter. I am unable to consent to such a motion on behalf of the Rossetti Respondents.

With kind regards,

Very truly yours,

  
William A. Bryan, Jr.

WABJR/acg

cc: George H. O'Kelley, Jr., Esquire [golaw@hargray.com](mailto:golaw@hargray.com)

EXHIBIT B

**From:** rmathlaw <rmathlaw@aol.com>  
**To:** golaw <golaw@hargray.com>  
**Cc:** wbryan <wbryan@collinsandlacy.com>  
**Bcc:** tom <tom@mikelllaw.com>; egsphy <egsphy@gmail.com>  
**Subject:** Fwd: Goodwin, etc. v. Rossetti, et al.; Case No. 2014-CP-07-02268.  
**Date:** Thu, Sep 21, 2017 4:16 pm

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George,

I have spoken to Mr. Bryan about the settlement. He evidently did not respond to previous communications by email because the proposal to carry the fee simple property to be deeded by the Rossetti interests to Cooky all the way to the marsh was a "deal killer" for Mr. Rossetti.

Actually, Cooky's desire was to have the fee simple property only to run approximately 15 feet beyond her outbuilding, not to the marsh, so this objection does not present a problem for her. Accordingly, Mr. Bryan now intends to review our settlement proposal with the carrier, though it is not clear when a response should be anticipated.

Accordingly, I intend to request an extension of the time within which the Appellant must file and serve her initial brief, and I wanted you to know that settlement remains a viable option. My assumption is that you will not oppose Cooky's motion, and I intend to so advise the court unless you notify me to the contrary.

Best regards.

Rob Mathison.

Law Offices of Mathison & Mathison  
Post Office Box 5271  
Hilton Head Island, SC 29938  
843-785-6503 [rmathlaw@aol.com](mailto:rmathlaw@aol.com)

-----Original Message-----

**From:** rmathlaw <rmathlaw@aol.com>  
**To:** wbryan <wbryan@collinsandlacy.com>  
**Cc:** golaw <golaw@hargray.com>  
**Sent:** Fri, Sep 15, 2017 2:39 pm  
**Subject:** Fwd: Goodwin, etc. v. Rossetti, et al.; Case No. 2014-CP-07-02268.

Mr. Bryan,

I have been out of pocket working on depositions in another case. I noticed, however, that you have not responded to my email below.

It would be helpful to have a response to our offer from your clients and the carrier?

Best regards.

Rob Mathison.

Law Offices of Mathison & Mathison  
Post Office Box 5271  
Hilton Head Island, SC 29938  
843-785-6503 [rmathlaw@aol.com](mailto:rmathlaw@aol.com)

EXHIBIT C

**From:** George O'Kelley <golaw@hargray.com>  
**To:** rmathlaw <rmathlaw@aol.com>  
**Subject:** Re: Goodwin, etc. v. Rossetti, et al.; Case No. 2014-CP-07-02268.  
**Date:** Thu, Sep 21, 2017 6:33 pm

---

OK with me

G

Sent from my iPhone

On Sep 21, 2017, at 4:16 PM, "[rmathlaw@aol.com](mailto:rmathlaw@aol.com)" <[rmathlaw@aol.com](mailto:rmathlaw@aol.com)> wrote:

George,

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Best regards.

Rob Mathison.

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**To:** wbryan <[wbryan@collinsandlacy.com](mailto:wbryan@collinsandlacy.com)>  
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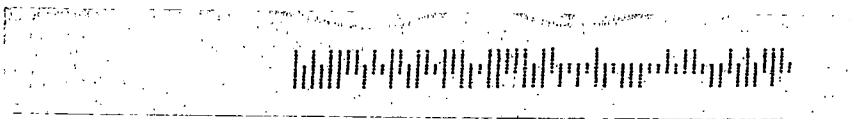
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Best regards.

EXHIBIT D

\$2.45<sup>9</sup>  
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SEP 27 2017

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
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Columbia, South Carolina 29211

TUE 26 SEP 2017 11 AM  
COLUMBIA SC 292