

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen
Fourteenth Judicial Circuit

Appellate Case No.: 2017-000685

RECEIVED
NOV 01 2017
SC Court of Appeals

Barbara Aimar Goodwin.....Appellant,

v.

Ronald A. 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.

**RESPONDENTS' RESPONSE TO APPELLANT'S MOTION TO EXTEND
TIME AND/OR TO PERMIT LATE FILING**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Counsel for Respondents Ronald A. 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 (“Rossetti Respondents”) received Appellant’s Motion To Extend Time And/Or To Permit Late Filing on October 30, 2017. Rossetti Respondents are opposed to a further extension of Appellant’s Initial Brief filing deadline. This is Appellant’s fourth request for an extension. The Notice of Appeal was filed March 15, 2017. The original deadline for Appellant’s Initial Brief and Designation of Matter was May 12, 2017. Since then, Appellant’s deadline for serving and filing the Initial Brief and Designation of Matter has been extended on

three occasions, allowing Appellant an additional five months to complete her Initial Brief. The most recent extension was granted by Order dated October 3, 2017 and extended the deadline to October 23, 2017. The present motion for yet another extension was mailed October 24, 2017, after the expiration of the previously extended deadline. Appellant has not shown why her Initial Brief could not be completed within the previous multiple extensions.

The grounds for Appellant's present motion do not justify a fourth extension. Bowen v. Lee Process Systems Co., 342 S.C. 232, 536 S.E.2d 86 (2000), was overruled more than three years ago. The fact that counsel for Appellant waited until the day before the brief was due to Shepardize the cited cases does not warrant another extension. This is particularly true when Appellant has already been granted three extensions totaling five months. If there was good cause for a fourth extension, Appellant should not have allowed the existing deadline to expire. Without demonstrating good cause for a fourth extension or good cause for the late filing of the instant motion, Appellant's motion should be denied.

For all of the foregoing reasons, Rossetti Respondents oppose Appellant's Motion To Extend Time And/Or To Permit Late Filing.

[SIGNATURE PAGE TO FOLLOW]

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen
Fourteenth Judicial Circuit

Appellate Case No.: 2017-000685

RECEIVED
NOV 01 2017
SC Court of Appeals

Barbara Aimar Goodwin, f/k/a Barbara A. Gilley.....Appellant,

v.

Ronald A. 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.

PROOF OF SERVICE


I certify that I have served Respondents' Response to Appellant's Motion to Extend Time
and/or to Permit Late Filing, by depositing a copy in the United States Mail, first class postage
prepaid, on November 1, 2017, addressed to the attorneys of record as follows:

Robert V. Mathison, Jr., Esquire
Mathison & Mathison
PO Box 5271
Hilton Head Island, SC 29938
Attorney for Appellant

George H. O'Kelley, Jr.
Attorney at Law
715 Bay Street
PO Box 1072
Beaufort, SC 29901
Attorney for Respondents Christopher T. Godley and Jade Godley

Respectfully submitted,

COLLINS & LACY, P.C.

By:  for

WILLIAM A. BRYAN, JR.
wbryan@collinsandlacy.com

AMY L. NEUSCHAFER
aneuschafer@collinsandlacy.com

11945 Grandhaven Drive, Suite D
Murrells Inlet, South Carolina 29576
843.353.2350 (voice)
843.353.2351 (fax)

ATTORNEYS FOR RESPONDENTS
RONALD A. 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



William A. Bryan, Jr. | 843.353.2330 | wbryan@collinsandlacy.com

November 1, 2017

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

RECEIVED
NOV 01 2017
SC Court of Appeals

Re: Barbara Aimar Goodwin, Appellant 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, Respondents
Appellate Case No.: 2017-000685
C&L File No.: 1-2234

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Respondents' Response to Appellant's Motion to Extend Time and/or to Permit Late Filing together with the Proof of Service for filing. Please return a filed copy of same in the self-addressed stamped envelope provided.

By copy of this letter to counsel of record, I hereby serve each with a copy of these documents.

With kind regards,

Sincerely,

A handwritten signature in cursive script that reads "Kenny Bundy Jr".
William A. Bryan, Jr.

WABJR/acg
Enclosures

cc: George H. O'Kelley, Jr., Esquire
Robert V. Mathison, Jr., Esquire