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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Circuit Court

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No.: 2018-000562

**RECEIVED**  
AUG 03 2018  
SC Court of Appeals

Mary P. Smith, Maezell Mitchell Jefferson, individually  
And as Personal Representative of the Estate of Annabelle  
Thornton, Shirrese B. Brockington, as Special Administrator  
of the Estate of Janine Gourdine, Emma Smalls, Viola Pringle,  
Cephus Thornton, Arthur Graddick, III, an imprisoned person,  
Venetra Watson, and any known or unknown persons or entities  
claiming any interest in the Estates of Lucinda Pringle, Odessa  
Graddick, Arthur Graddick, Jr., Annabelle Thornton and  
Janine Gourdine,

.....Appellants,

v.

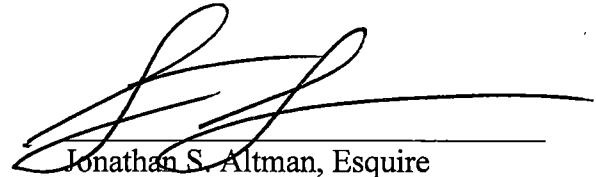
Angus M. Lawton, Personal Representative of the Estate of  
Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr.  
and unknown PR Rebecca Patricia Brown,

.....Respondents.

**RESPONDENTS' MOTION FOR EXTENSION OF  
TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rule SCRCP 263 (b), Respondents' Angus M. Lawton, Personal Representative of the Estate of Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr., and unknown PR Rebecca Patricia Brown (hereinafter "Respondents") hereby respectfully move for an extension of thirty (30) days to file their Initial Brief and Designation of Matter. Appellants' counsel, T. Jeff Goodwyn, Jr., Esq., has been apprised of this request and has no objections as is evidenced by the attached email in Exhibit A to this Motion for Extension of Time. Respondents' Initial Brief and Designation of Matter shall now be due on or before Monday, August 20, 2018.

July 30, 2018



Jonathan S. Altman, Esquire  
Derfner & Altman, LLC  
575 King Street, Suite B  
Charleston, SC 29403

Stephen M. Slotchiver, Esq.  
Slotchiver & Slotchiver, LLP  
44 State Street  
Charleston, SC 29401

*Attorneys for Respondents*

Angus M. Lawton, Esq.  
496 Bramson Court, Suite 100  
Mt. Pleasant, SC 29464

*PR of the Estate of Lucinda Pringle*

T. Jeff Goodwyn, Jr., Esq.  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, SC 29205

*Attorney for Appellants*

Ayesha T. Washington, Esq.  
The Washington Law Firm, LLC  
P.O. Box 30026  
Charleston, SC 29417

*Attorney for Appellants/  
Special Administrator*

# **EXHIBIT A**



Jonathan Altman <jaltman@derfneraltman.com>

**FW: Motion "MOFREE-Motion/Consider Brief etc Timely Filed by Appellant, crt/srv" for Case "2017CP1000398-Mary P Smith , plaintiff, et al VS Angus M Lawton , defendant, et al" was added to a Motions Roster for 8/31/2017 at 12:00 PM**

Jonathan Altman <jaltman@derfneraltman.com>

Mon, Jul 9, 2018 at 8:29 AM

To: Jeff Goodwyn <JGoodwyn@goodwynlaw.com>, Rachel Savini <rsavini@derfneraltman.com>

Jeff, Hope you are having a good Summer. I will be out the latter half of July on a family vacation and will be petitioning the court of Appeals for an extension to file Respondent's initial brief. You should have received a letter from me as to this request. Please advise as to whether you have any objection. Thanks, Jon

[Quoted text hidden]

--  
Jonathan S. Altman  
Derfner & Altman, LLC  
575 King Street, Suite B  
Charleston, SC 29403  
Telephone: (843) 723-9804  
Facsimile: (843) 723-7446  
Email: jaltman@derfneraltman.com

**\*\*\*PLEASE NOTE THE FOLLOWING\*\*\***

**FIRM NAME: DERFNER & ALTMAN, LLC**

**ADDRESS: 575 KING STREET, SUITE B, CHARLESTON, SC 29403**

**NEW EMAIL ADDRESS: jaltman@derfneraltman.com**

Unless expressly stated to the contrary herein, (a) nothing contained in this message was intended or written to be used, can be used, nor may be relied upon or used, by any taxpayer for the purpose of avoiding penalties that could be imposed upon the taxpayer under the Internal Revenue Code of 1986, as amended; and (b) any written statement contained herein relating to any federal tax transaction or issue may not be used by any individual or entity to, recommend or support the promotion or marketing of any such transaction or issue.

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Jonathan Altman <jaltman@derfneraltman.com>

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**FW: Motion "MOFREE-Motion/Consider Brief etc Timely Filed by Appellant, crt/srv" for Case "2017CP1000398-Mary P Smith , plaintiff, et al VS Angus M Lawton , defendant, et al" was added to a Motions Roster for 8/31/2017 at 12:00 PM**

---

Jeff Goodwyn <JGoodwyn@goodwynlaw.com>  
To: Jonathan Altman <jaltman@derfneraltman.com>  
Cc: Rachel Savini <rsavini@derfneraltman.com>

Mon, Jul 9, 2018 at 11:19 AM

No objection from me. I'll let them know if they ask. You can let them know that you confirmed with me and I do not have an objection.

Sent from my iPhone  
[Quoted text hidden]

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Circuit Court

Kristi Lea Harrington, Circuit Court Judge

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Mary P. Smith, Maezell Mitchell Jefferson, individually  
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.....Appellants,

v.

Angus M. Lawton, Personal Representative of the Estate of  
Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr.  
and unknown PR Rebecca Patricia Brown,

.....Respondents.

**PROOF OF SERVICE**

I certify that I have served Respondents' Motion for Extension of Time to file Initial Brief and Designation of Matter on Appellants Mary P. Smith, Maezell Mitchell Jefferson, individually and as Personal Representative of the Estate of Annabelle Thornton, Shirrese B. Brockington, as Special Administrator of the Estate of Janine Gourdine, Emma Smalls, Viola Pringle, Cephus Thornton, Arthur Graddick, III, an imprisoned person, Venetra Watson, and any known or unknown persons or entities claiming any interest in the Estates of Lucinda Pringle, Odessa Graddick, Arthur Graddick, Jr., Annabelle Thornton and Janine Gourdine by depositing a copy of it in the United States Mail, postage prepaid, on July 30, 2018, properly addressed to their attorney(s) of record as follows:

T. Jeff Goodwyn, Jr., Esq.  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, SC 29205

*Attorney for Appellants*

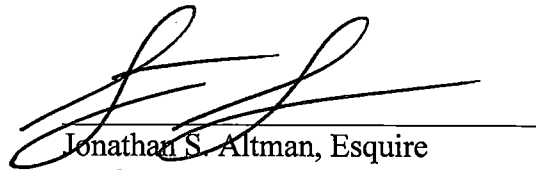
Angus M. Lawton, Esq.  
496 Bramson Court, Suite 100  
Mt. Pleasant, SC 29464

*PR of the Estate of Lucinda Pringle*

Ayesha T. Washington, Esq.  
The Washington Law Firm, LLC  
P.O. Box 30026  
Charleston, SC 29417

*Attorney for Appellants/  
Special Administrator*

July 30, 2018



Jonathan S. Altman, Esquire  
Derfner & Altman, LLC  
575 King Street, Suite B  
Charleston, SC 29403

Stephen M. Slotchiver, Esq.  
Slotchiver & Slotchiver, LLP  
44 State Street  
Charleston, SC 29401

*Attorneys for Respondents*

# D · & · A

D E R F N E R  
& A L T M A N

July 30, 2018

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
AUG 03 2018  
SC Court of Appeals

RE: Mary P. Smith, et al. v. Angus M. Lawton, et al.  
Appellate Case No. 2018-000562

Dear Ms. Kitchings:

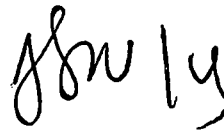
Please find enclosed an original and one copy of the following relative to the above referenced matter:

1. Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter;
2. Proof of Service upon Appellants' counsel of same; and
3. This firm's check in the amount of \$25.00 for the filing fee associated with said motion.

Please file the originals and return clocked-in copies to me in the enclosed self-addressed stamped envelope. Please contact me with any questions you may have regarding the above matter.

Yours Very Truly,

DERFNER & ALTMAN, LLC



Jonathan S. Altman

JSA/rs

Enclosures

cc: Stephen M. Slotchiver, Esq.  
Angus M. Lawton, Esq.  
T. Jeff Goodwyn, Jr., Esq.  
Ayesha Washington, Esq.

ARMAND DERFNER | SAMUEL H. ALTMAN | JONATHAN S. ALTMAN

D E R F N E R  
& A L T M A N



UNITED WE STAND



PITNEY BOWES

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MAILED FROM ZIP CODE 29401

**RECEIVED**

AUG 08 2018

SC Court of Appeals

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201