

THE LAW OFFICE OF  
W. WESTBROOK WILLS III

W. WESTBROOK WILLS III  
*Admitted in Georgia & South Carolina*

CIVIL TRIAL LAWYER  
P.O. BOX 822  
FOLLY BEACH, SC 29439

TELEPHONE: (843) 805-6300  
FACSIMILE: (866) 922-8596  
wwills@wwillslaw.com

September 10, 2018

**RECEIVED**

SEP 10 2018

VIA US AND  
ELECTRONIC MAIL  
South Carolina Supreme Court  
ATTN: Daniel Shearouse  
PO Box 11330  
Columbia, SC 29211

**S.C. SUPREME COURT**

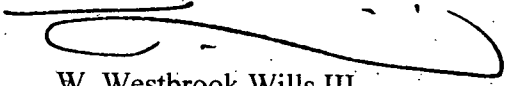
**Re: Betty Fisher v. Bessie Huckabee AND Lisa Fisher v. Bessie Huckabee  
Appellate Case Nos.: 2018-000566 and 2018-000662**

Dear Mr. Shearouse,

Please find enclosed 1 original and 6 copies of each of Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record in the above two matters. I have also enclosed a Proof of Service for each, and the filing fee for both of \$50.00

Please contact me if you have any questions regarding this filing.

Very truly yours,

  
W. Westbrook Wills III

cc: Lisa and Betty Fisher.  
Barbara Seymour, Esq.  
Mary Francis Jowers, Esq.

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

**RECEIVED**

SEP 10 2018

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**S.C. SUPREME COURT**

Thomas L. Hughston, Jr., Circuit Court Judge

---

Circuit Court Case No. 2009-CP-10-3010  
Appellate Case No. 2018-000566

Ex parte:

John Hughes Cooper..... Appellant,

Betty Fisher and Lisa Fisher..... Plaintiffs,

v.

Bessie Huckabee, Kay..... Respondents.  
Passailaigue Slade, and  
Sandra Byrd,

In the Matter of the Estate of  
Alice Shaw-Baker.

---

**MOTION FOR EXTENSION  
TO FILE INITIAL BRIEF**

---

Respondents respectfully move this Court for an extension of time of seven days until September 17, 2018 to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

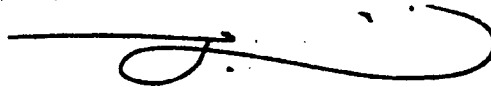
Respondents' motion is based on the following grounds:

1. By Order dated August 2, 2018, this Court set an expedited identical briefing schedule in the following cases:
  - a. Appellate Case No. 2018-000662
  - b. Appellate Case No. 2018-000566
  - c. Appellate Case No. 2017-000743
2. The Court's Order further specifies that no extensions will be granted absent a showing of extraordinary circumstances.
3. Respondents Initial Briefs in Appellate Case Nos. 2018-000662 and 2018-000566 are due to be filed and served on September 11, 2018.
4. As of 1:00 p.m. this Monday afternoon, September 10, 2018, Governor Henry McMaster declared a state of emergency and ordered a mandatory evacuation of coastal cities in South Carolina due to dangerous weather conditions related to hurricane Florence.
5. Attorneys for the Respondents in each case reside in Charleston and Folly Beach, South Carolina, and are subject to the mandatory evacuation.
6. Local Post Offices and Government buildings in the Charleston and Folly Beach area will be closed on September 11th due to the hurricane and evacuation, and counsel for Respondents will not be able to mail their briefs due to the closings.
7. Additionally, preparations for the hurricane and evacuation are now interfering with our ability to complete the briefs by tomorrow's filing deadline.
8. Respondents make this motion and request is made in advance of the filing deadline.

WHEREFORE, the Respondents respectfully request that they be allowed until September 17, 2018 by which to file and serve their Initial Brief and Designation of Matter to be

Included in the Record on Appeal in Appellate Case Nos. 2018-000662 and 2018-000566.

Respectfully submitted,



W. Westbrook Wills III  
Law Office of  
W. Westbrook Wills III  
P.O. Box 822  
Folly Beach, SC 29439  
Tel. (843)-805-6300  
wwills@wwillslaw.com  
Attorney for Respondents

Other parties of record:

Barbara Seymore, Esq.  
Clawson and Staubes, LLC  
1612 Marion Street, Suite 200  
Columbia, SC 29201-2939

Other parties of record:

Lisa Fisher  
P.O. Box 91112  
Long Beach, CA 90809-1112  
Tel. (866) 206-9066  
Lfisher6736@yahoo.com

Betty Fisher  
P.O. Box 91112  
Long Beach, CA 90809-1112  
Tel. (866) 206-9066

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

**RECEIVED**

SEP 10 2018

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**S.C. SUPREME COURT**

Thomas L. Hughston, Jr., Circuit Court Judge

---

Circuit Court Case No. 2009-CP-10-3010  
Appellate Case No. 2018-000566

Ex parte:

John Hughes Cooper..... Appellant,

Betty Fisher and Lisa Fisher..... Plaintiffs,

v.

Bessie Huckabee, Kay..... Respondents.  
Passailaigue Slade, and  
Sandra Byrd,

In the Matter of the Estate of  
Alice Shaw-Baker.

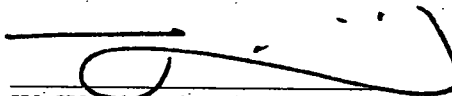
---

**PROOF OF SERVICE**

---

I certify that I have served the enclosed Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record by depositing a copy in the United States Mail, postage prepaid, on September 10, 2018, addressed to Barbara Seymour, Esq., 1612 Marion Street, Suite 200, Columbia, SC 29201-2939.

LAW OFFICE OF  
W. WESTBROOK WILLS III



W. Westbrook Wills III  
P.O. Box 822  
Folly Beach, SC 29439  
Tel. (843)-805-6300  
wwills@wwillslaw.com  
*Attorney for the Respondents*