

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
OCT 31 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 FINAL BRIEF**

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 twenty (20) days to file their Final Brief. Appellants' counsel, T. Jeff Goodwyn, Jr., Esq., has been apprised of this request and has no objection as is evidenced by the attached email (Exhibit A) to this Motion for Extension of Time. Respondents' Final Brief shall now be due on or before Wednesday, November 21, 2018.



October 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



Rachel Savini <rsavini@derfneraltman.com>

Estate of Lucinda Pringle

3 messages

Rachel Savini <rsavini@derfneraltman.com>
To: Mary Bush <mbush@goodwynlaw.com>

Tue, Oct 30, 2018 at 1:39 PM

Hi Mary.

Does Mr. Goodwyn have any objection to us requesting a 20 day extension to file our Final Brief?

Thank you,
Rachel R. Savini, Paralegal
Derfner & Altman, LLC
575 King Street, Suite B
Charleston, SC 29403
Telephone: (843) 723-9804, ext. 233
Facsimile: (843) 723-7446
E-mail: rsavini@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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Mary Bush <mbush@goodwynlaw.com>
To: Rachel Savini <rsavini@derfneraltman.com>

Tue, Oct 30, 2018 at 1:55 PM

No he has no objection

From: Rachel Savini <rsavini@derfneraltman.com>
Sent: Tuesday, October 30, 2018 1:39 PM
To: Mary Bush <mbush@goodwynlaw.com>
Subject: Estate of Lucinda Pringle

[Quoted text hidden]

Rachel Savini <rsavini@derfneraltman.com>
To: Mary Bush <mbush@goodwynlaw.com>

Tue, Oct 30, 2018 at 1:57 PM

Great, thank you!

Thank you,
Rachel R. Savini, Paralegal
Derfner & Altman, LLC

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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 Final Brief 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 October 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

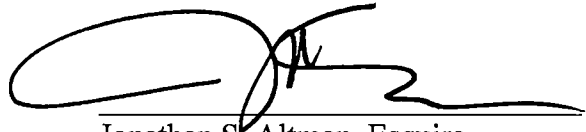
Angus M. Lawton, Esq.
496 Bramson Court, Suite 100
Mt. Pleasant, SC 29464

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*

October 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

DERFNER
& ALTMAN

October 30, 2018

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

RECEIVED
OCT 31 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 Final Brief;
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

843.723.9804 (PHONE) | 843.723.7446 (FAX) | 575 KING STREET | SUITE B | CHARLESTON, S.C. 29403 | WWW.DERFNERALTMAN.COM

RACHEL SAVILL 843-723-9894 DERPHER & ALTMAN, LLC 575 KING STREET, SUITE B CHARLESTON SC 29403		1 LBS	1 OF 1
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