

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE WILLIAMSBURG COUNTY
COURT OF COMMON PLEAS

RECEIVED

NOV 05 2018

SC Court of Appeals

Circuit Court Case No.: 2017-CP-45-0224
Appellate Case No.: 2017-001077

April Grant Mack, as Personal Representative
of the Estate of Barrett Demetric Jeremiah Mack..... Respondent,

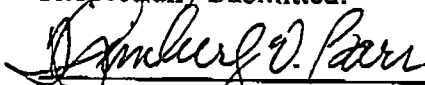
vs.

Necole Binyard, as Personal Representative
of the Estate of Harry Rufus Emmanuel Washington.....Appellant.

**MOTION OF RESPONDENT FOR FIVE-DAY
EXTENSION TO FILE FINAL BRIEF**

The respondent, by and through her undersigned attorney, hereby moves this Honorable Court for an order granting her a five-day extension to file the final brief. In support of this motion, respondent would show that the amended record on appeal was received on October 17, 2018. Due to time constraints posed by other unrelated legal matters, respondent is unable to have the final brief copied and served within twenty (20) days as required by Rule 211(a), SCACR.

Respectfully Submitted:



Kimberly V. Barr (Bar No.: 8443)
Ronnie A. Sabb (Bar No.: 9814)
Sabb Law Group, L.L.C.
108 W. Main Street
Post Office Box 88
Kingstree, South Carolina 29556
kbarr@sabblaw.com
(843) 355-5349
Attorneys for Respondent

November 5, 2018

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE WILLIAMSBURG COUNTY
COURT OF COMMON PLEAS

RECEIVED

NOV 05 2018

Circuit Court Case No.: 2017-CP-45-0224
Appellate Case No.: 2017-001077

SC Court of Appeals

April Grant Mack, as Personal Representative
of the Estate of Barrett Demetric Jeremiah Mack..... Respondent,

vs.

Necole Binyard, as Personal Representative
of the Estate of Harry Rufus Emmanuel Washington.....Appellant.

PROOF OF SERVICE

I hereby certify that I served the respondent's motion for extension to file the final brief on all counsel of record, by depositing a copy of it in the United States Mail, postage prepaid, on November 5, 2018 and addressed to them as follows: William J. Barr, Esquire, 108 N. Academy Street, Kingstree, South Carolina 29556; Jonathan M. Robinson, Esquire, 935 Broad Street, Camden, South Carolina 29020; Ashley B. Nance, Esquire, Post Office Box 1764, Florence, South Carolina 29503 .

November 5, 2018



Kimberly V. Barr (SC Bar No.: 8443)
Ronnie A. Sabb (SC Bar No.: 9814)
Sabb Law Group, L.L.C.
108 W. Main Street
Post Office Box 88
Kingstree, South Carolina 29556
kbarr@sabblaw.com
(843) 355-5349

Attorneys for Respondent

RECEIVED

NOV 05 2018

Moore & Van Allen
SC Court of Appeals

FACSIMILE

FROM	Robert E. Sumner, IV
DATE	November 5, 2018
TIME	

PAGES INCLUDING COVER SHEET	1	USER NUMBER	8669
CLIENT/MATTER	029018.000023		

Robert E. Sumner, IV
Attorney at Law

T 843 579 7018
F 843 579 8743
robertsumner@mvalaw.com

Moore & Van Allen PLLC

78 Wentworth St.
Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

- NO CONFIRMATION COPY OF THIS FACSIMILE WILL BE SENT.
- A CONFIRMATION COPY OF THIS FACSIMILE WILL BE SENT VIA REGULAR MAIL.
- A CONFIRMATION COPY OF THIS FACSIMILE WILL BE SENT VIA OVERNIGHT MAIL.
- A CONFIRMATION COPY OF THIS FACSIMILE WILL BE SENT VIA CERTIFIED MAIL.

Attention:

	NAME	COMPANY	TELEPHONE	FACSIMILE
1	Elizabeth Carter	SC Court of Appeals	803-734-1890	803-734-1839
2				
3				
4				
5				
6				
7				

Remarks: Sea Island Food Group v. Yaschik Development, et al.

Appellate Case No. 2018-000906

Dear Ms. Carter,

With regard to the above-referenced matter and to memorialize/confirm our telephone conversation of this date with regard to the Consent Motion to Hold Appeal in Abeyance filed on October 25, 2018, it is my understanding the filing of Appellant's initial brief is held in abeyance pending the processing of the Order.

If my understanding of our conversation is incorrect, please kindly notify me as soon as possible at 843-579-7084 or by e-mail at wendystockhausen@mvalaw.com.

Thank you for your assistance in this matter.

Sincerely,

Wendy Stockhausen, Paralegal

To comply with certain U.S. Treasury regulations, we inform you that, unless expressly stated otherwise, any U.S. Federal tax advice contained in this fax, including attachments, is not intended or written to be used, and cannot be used, by any person for the purpose of avoiding any penalties that may be imposed by the Internal Revenue Service.

IF FAX IS ILLEGIBLE OR INCOMPLETE, PLEASE CALL Wendy Stockhausen AT 843 579 7084.

Unless otherwise indicated, a facsimile machine printout of this document shall be considered an original counterpart of the document, and a writing with the sender's signature, if any, printed thereon deemed an original signature. The information contained in this facsimile message is attorney privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is wrongful and may subject you to civil liability. If you have received this communication in error, please immediately notify us by telephone, and return the original message to us at the above address via the U.S. Postal Service. Thank you.

Charlotte, NC
Research Triangle Park, NC
Charleston, SC

RONNIE A. SABB
 KIMBERLY V. BARR
 KIMBERLY M. HODGE



LAKE CITY OFFICE:
 215 W. THOMAS STREET
 POST OFFICE BOX 638
 LAKE CITY, SC 29560
 PHONE: (843) 374-1628
 FAX: (843) 374-1707

ATTORNEYS AND COUNSELORS AT LAW

November 5, 2018

Via Facsimile (803) 734-1839
 The Honorable Jenny Abbott Kitchings
 Clerk of South Carolina Court of Appeals
 Post Office Box 11629
 Columbia, South Carolina 29211

RECEIVED

NOV 05 2018

SC Court of Appeals

RE: Estate of Barrett Mack vs. Estate of Harry Washington
 Circuit Court Case No.: 2017-CP-45-0224
 Appellate Court Case No.: 2017-00107

Dear Ms. Kitchings:

In connection with the matter referenced above, please find enclosed for filing the original and one copy of the respondent's motion for a five-day extension to file the final brief. I have enclosed a check in the amount of \$25 to cover the filing cost.

By copy of this letter, I am serving the motion on William J. Barr, counsel for the appellant.

With kindest regards, I

Very truly yours,

Kimberly V. Barr

KVB:

enclosures

cc: William J. Barr, Esquire (w/ enclosures)
 Jonathan M. Robinson, Esquire (w/ enclosures)
 Ashley B. Nance, Esquire (w/ enclosures)

Sabb Law Group, L.L.C.

Attorneys and Counselors at Law

215 West Thomas Street
Post Office Box 658
Lake City, South Carolina 29560
Telephone: (843) 374-1628
Facsimile: (843) 374-1707

RECEIVED

NOV 05 2018

SC Court of Appeals

FACSIMILE COVER SHEET

DATE: November 5, 2018

TO: The Hon. Jenny Abbott Kitchings

NUMBER: (803) 734-1839

FROM: Kimberly V. Barr, Esquire

TRANSMITTER: Diane McFadden

RE: Est. of Barrett Mack v. Est. of Harry Washington

CIRCUIT COURT
CASE NUMBER: 2017-CP-45-0224

APPELLATE COURT
CASE NUMBER: 2017-00107

Transmitting 4 Page(s), including cover sheet.

COMMENTS/MESSAGE: Please see motion for extension attached. Thank you.

CONFIDENTIALITY NOTE:

The information contained in this facsimile message is legally privileged and confidential; information intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this telecopy is strictly prohibited. If you have received this telecopy in error please notify us by telephone immediately and destroy this message. **THANK YOU.**

✓