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**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM THE COURT OF COMMON PLEAS

Roger L. Couch, Circuit Court Judge
Irvin G. Condon, Probate Court Judge

RECEIVED
JAN 16 2019
SC Court of Appeals

Appellate Case No. 2016-001141
Op. No. 5608, filed January 4, 2019

Peter J. Wellin, Cynthia W. Plum and Marjorie W. King

Appellants,

v.

Keith S. Wellin,

Respondent.

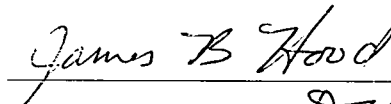
Motion for Extension of Time

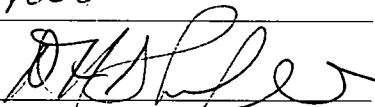
On January 4, 2019, this Court issued an opinion in the above captioned case. Pursuant to Rule 221, SCACR, the current deadline for a petition for rehearing is Tuesday, January 21, 2019¹. The Respondent contemplates filing a Petition for Rehearing to seek reconsideration of certain factual findings made for the Court in its opinion, and respectfully seeks an extension of time to confer and coordinate with other Counsel regarding options to resolve concerns regarding the possible implications in other related pending litigation.

¹ The 15th day falls on a Saturday, January 19, 2019, and Monday, January 20, is an official State holiday.

Counsel for the Appellants had been consulted and has no objection to this request. Accordingly, the Respondent moves the Court for a 10-day extension of time for either party to file a petition for rehearing.

Respectfully submitted,



With Permission by 

Deborah Harrison Sheffield (#2757)

Robert H. Hood, Sr., Esq. (SC# 2599)
James B. Hood, Esq. (SC #70212)
HOOD LAW FIRM, LLC
Post Office Box 1508
Charleston, SC 29402
(843)577-4435 (843) 722-1630 (fax)
Attorney for Keith S. Wellin

Tiffany N. Provence, Esq. (SC #13912)
PROVENCE MESSERVY, LLC
300 N. Cedar Street, Suite A
Summerville, SC 29483
(843) 871-9500 (843) 261-7035 (fax)
Attorney for Edward G.R. Bennett
as Special Conservator for Keith S. Wellin

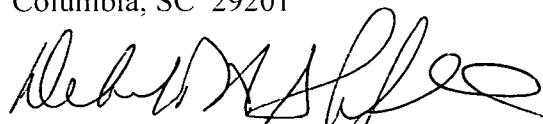
January 16, 2019

CERTIFICATE OF SERVICE

The undersigned certifies that on this 16th day of January, 2019, a copy of the foregoing Motion, was served by depositing said copy in the U.S. Mail, with sufficient first-class postage, on the following counsel at the addresses listed below:

Robert H. Brunson, Esquire
Merritt G. Abney, Esquire
Patrick C. Wooten, Esquire
Nelson Mullins Riley & Scarborough LLP
151 Meeting Street, Suite 600
Charleston, SC 29401-2239

Mattison Bogan, Esquire
Nelson Mullins Riley & Scarborough LLP
1320 Main Street/ 17th Floor
P.O. Box 11070 (29211-1070)
Columbia, SC 29201



Deborah Harrison Sheffield

RECEIVED

JAN 16 2019

SC Court of Appeals 2

Subject: **FW: Ext. of time - Wellin**
Date: 1/16/2019 3:30:08 PM Eastern Standard Time
From: james.hood@hoodlaw.com
To: DHSheffieldAtty@aol.com

Here is their consent.

From: Merritt Abney <merritt.abney@nelsonmullins.com>
Sent: Wednesday, January 16, 2019 1:54 PM
To: Jamie Hood <james.hood@hoodlaw.com>
Cc: Robert Brunson <robert.brunson@nelsonmullins.com>; Patrick Wooten <Patrick.Wooten@nelsonmullins.com>
Subject: RE: Ext. of time - Wellin

Jamie – This looks fine. We consent.

Thanks.

MERRITT G. ABNEY PARTNER

merritt.abney@nelsonmullins.com

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151 MEETING STREET | CHARLESTON, SC 29401

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NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

From: Jamie Hood [mailto:james.hood@hoodlaw.com]
Sent: Wednesday, January 16, 2019 1:30 PM

To: Merritt Abney <merritt.abney@nelsonmullins.com>
Subject: Ext. of time - Wellin

Merritt

See the attached and let me know if you consent. I made it a mutual extension of time in case you wanted additional time too.

Jamie Hood

Partner

James.Hood@hoodlaw.com



172 Meeting Street

P.O. Box 1508

Charleston, SC 29401

Direct: (843) 577-1223

Fax: (843) 722-1630

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January 17, 2019

HAND DELIVERED

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
JAN 16 2019
SC Court of Appeals

RE: Wellin v. Wellin; Appellate Case No. 2016-001141

Dear Clerk:

The Court issued its order in this case on January 4, 2019; and thus, the deadline for any petition for rehearing is Tuesday January 21, 2019. I am submitting the original and six (6) copies of a Motion for Extension asking the Court to grant a 10-day extension to allow time for consultation with other counsel regarding the impact of this opinion on other pending litigation. The attached email evidences consultation with Appellants' Counsel and his consent to this motion.

I am enclosing a check for the \$50.00 filing fee, and I am serving a copy upon Appellants' Counsel of Record by copy of this letter.

Thank you for your consideration of this request.

Sincerely,



Deborah H. Sheffield

cc: Robert H. Brunson, Esquire
Merritt G. Abney, Esquire
Patrick C. Wooten, Esquire
Mattison Bogan, Esquire
Tiffany Provence, Esquire