

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Common Pleas

Alison Renee Lee, Circuit Court Judge

**RECEIVED**

MAR 04 2019

SC Court of Appeals

Case No. 2018-CP—32-01221  
Appellate Case No.: 2018-002134

Bryan Walling ..... Respondent

v.

Judi Castro d/b/a A Mother's Prayer ..... Appellant

NOTICE OF AND MOTION TO EXPAND TIME TO FILE APPELLANT'S INITIAL BRIEF

**TO: THE RESPONDENT AND HIS COUNSEL HOLLY-MARIE SARVIS PATTERSON, ESQUIRE**

YOU WILL TAKE NOTICE hereby that the Appellant by and through her undersigned counsel will move on the tenth day following service hereof before the South Carolina Court of Appeals for an Order to allow the filing of Appellant's Initial Brief outside of the time set for such filing set by Rules 208 and 209 of the South Carolina Appellate Court Rules.

The Motion is based upon the Rules of this Court and is supported by affidavit of counsel.

**\*\*\* SIGNATURE PAGE TO FOLLOW \*\*\***

Respectfully Submitted,

LAW OFFICE OF LAWRENCE KEITT

A handwritten signature in black ink, appearing to read 'Lawrence Keitt', written over a horizontal line.

Lawrence Keitt, Esquire  
340 Summers Avenue  
P. O. Box 811  
Orangeburg, SC 29116  
(803) 531-2379

ATTORNEY FOR APPELLANT

February 28, 2019  
Orangeburg, SC

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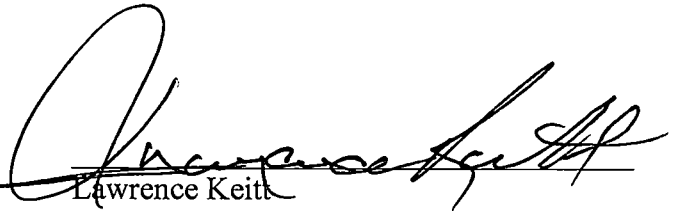
**AFFIDAVIT IN SUPPORT OF MOTIN TO EXPAND TIME**

I, Lawrence Keitt being first duly sworn would show that the Appellant filed her Appeal Pro Se without prior Notice to counsel. The basis for the Appellant's Appeal is her allegation that I failed to file her Motion for Reconsideration timely. Given this fact I assumed I was not responsible for any work to help the Appellant perfect her appeal.

However, I was informed by the Clerk of this Court that until I was relieved by order of the lower Court I was still counsel of record in this matter. I therefore filed a Motion to be relieved in the lower Court which was granted on January 23, 2019.

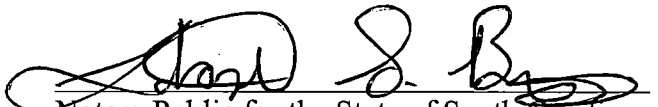
Again I thought my involvement in this matter ended when I sent the transcript of the to the Appellant. However, I was informed again by the Clerk of this Court that I was still counsel of record because the Appel had been filed and I had not been relieved by this Court.

Thus, my confusion regarding my status and duties in this matter was the cause of the delay in filing the Appellant's Initial brief. Given my inadvertent errors I would request the Court grant my request to expand the time for filing the Appellant's Initial Brief and other documents in this matter.



Lawrence Keith

SWORN AND SUBSCRIBED before me  
This 28 th day of February 2019.



Notary Public for the State of South Carolina  
My Commission Expires: November 19, 2025

*Law Office of Lawrence Keitt*

ATTORNEY AT LAW  
P.O. Box 811  
340 SUMMERS AVENUE  
ORANGEBURG, SOUTH CAROLINA 29116

TELEPHONE (803) 531-2379  
FACSIMILE (803) 534-2897

LAWRENCE KEITT

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

February 28, 2019

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SC Court of Appeals

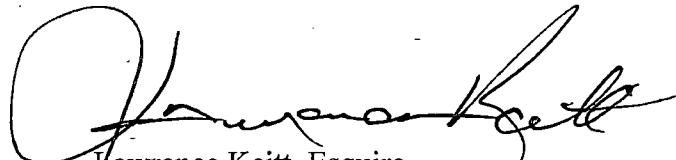
Re: Judi Castro v. Bryan Walling  
Appellate Case No.: 2018-002134

Dear Ms. Kitchings:

Enclosed to be filed are the Appellant's Initial Brief and Designation of Matters, A Motion to Expand Time to allow the filing of the brief and a Motion to be Relieved as counsel for the Appellant. I am also enclosing my firm check in the amount of \$100.00 for the filing of the two Motions.

I would ask that one copy of each document be returned to me in the envelope enclosed for your convenience.

Sincerely,

  
Lawrence Keitt, Esquire

cc: Holly Marie Sarvis-Patterson, Esquire  
Judi Castro

LK/lrb

✓

PECIFIED\*  
LUDED\*  
D\*

*Law Office of Lawrence Keitt*  
ATTORNEY AT LAW  
P.O. Box 811 • 340 SUMMERS AVENUE  
ORANGEBURG, SOUTH CAROLINA 29116

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
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