

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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Civil Action No.: 2010-CP-30-0116

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Willie D. Watson ..... Appellant.

v.

Nancy Carol Underwood, individually and as putative trustee of the Willie D. Watson Trust; John H. Watson, individually and as putative trustee of the Willie D. Watson Trust; and Future and Potential Heirs of Willie D. Watson ..... Respondents.

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RESPONDENTS' MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF AND DESIGNATION OF  
MATTER FOR THE RECORD ON APPEAL

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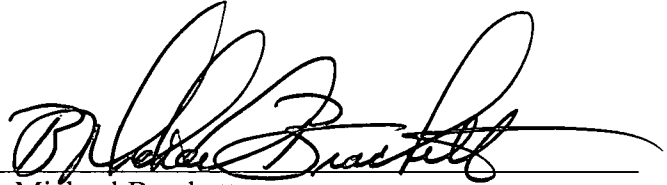
Pursuant to Rules 224 and 234(b), SCACR, Respondents hereby move the Court for an Order granting an additional fifteen (15) day extension of time in which to file their Initial Brief and Designation of Matter for the Record on Appeal. This Motion is based upon the following grounds:

- A. These Respondents were previously granted a thirty (30) day extension, requiring the Initial Brief and Designation to be due on or before December 28, 2012;
- B. Holiday activities and schedules have proven to be more of a challenge to the preparation of the Initial Brief than previously anticipated;

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DEC 27 2012  
SC Court of Appeals

C. The undersigned has consulted with Appellant's counsel regarding the Motion, and counsel for Appellant has no objection to the requested extension.

The requested extension would run through and include Monday, January 14, 2013.

A handwritten signature in black ink, appearing to read "B. Michael Brackett", written over a horizontal line.

B. Michael Brackett  
Moses & Brackett, PC  
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Attorneys for Respondents

December 20, 2012

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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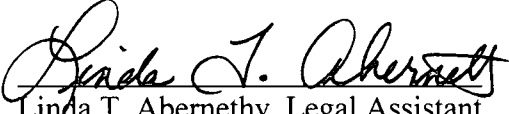
I, Linda T. Abernethy, Legal Assistant to B. Michael Brackett, Esquire, attorney for the Respondents in the above-captioned matter, do hereby certify that I have served counsel for the Appellant with a copy of **Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter for the Record on Appeal**, by United States Mail, postage prepaid and return address clearly indicated on said envelope, on this 20<sup>th</sup> day of December, 2012, at the following addresses:

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SC Court of Appeals

**Served:** T. Jeff Goodwyn, Jr., Esquire  
2519 Devine Street  
Suite A  
Columbia, SC 29205  
Attorney for Appellant

  
Linda T. Abernethy, Legal Assistant  
Moses & Brackett, PC

# MOSES & BRACKETT, PC

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December 20, 2012

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

RE: Watson v. Underwood, et. al.  
2010-CP-30-0116  
Appellate Case No.: 2012-211966  
Our File Number - 12006.3

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter for the Record on Appeal. The current deadline is December 28, 2012, and by my calculation the extended deadline will be January 14, 2013.

I have spoken with Appellant's attorney, and he has no objection. My check in the amount of \$25.00 is enclosed for the required motion fee.

Thank you for your courtesy and assistance.

Very truly yours,



B. Michael Brackett

BMB/lta  
Enclosures

cc. Ms. Nancy C. Underwood  
Mr. John H. Watson  
T. Jeff Goodwyn, Jr., Esquire

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