

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals.

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

D. Reece Williams, III, Special Referee

**RECEIVED**

Case No. 2018-CP-40-03590

Appellate Case No. 2019-

APR 30 2019  
SC Court of Appeals

Keon Mitchell .....Appellant,

v.

Bridgette Keeley.....Respondent.

**NOTICE OF APPEAL**

Keon Mitchell appeals the Order of D. Reece Williams, III dated March 6, 2019. Appellant filed a timely Rule 59 Motion which was denied by substantive order entered on March 19, 2019 with Appellant receiving written notice of the entry of said order on the same day.

**ROE CASSIDY COATES & PRICE, P.A.**

/s/ Joshua J. Hudson  
Joshua J. Hudson (S.C. Bar No. 100311)  
1052 N. Church St.  
Greenville, SC 29601  
Phone: (864) 349-2600  
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**Attorneys for Appellant**

April 15, 2019  
Greenville, South Carolina



**Roe Cassidy  
Coates & Price PA**

JOSHUA J. HUDSON  
DIRECT DIAL: 864.349.2606  
EMAIL: JHUDSON@ROECASSIDY.COM  
LICENSED IN SC AND KY

April 25, 2019

**VIA USPS**

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

**RECEIVED**

APR 30 2019

SC Court of Appeals

**Re:** Bridgette Keeley v. Keon Mitchell  
Appellate Case No. 2019-000662  
RCCP No. 2566.0179

Dear Madam Clerk:

Enclosed for filing, please find the original Motion for Extension of Time to File Initial Brief and six copies of same in the above-referenced case. Please file the Motion and return a filed stamped copy to us in the self-addressed, stamped envelope provided herein. Also, enclosed please find the Proof of Service on Respondent and a \$50.00 check to cover the cost of the filing fee.

Please allow this letter to serve as notice that we are in receipt of the hearing transcripts as of April 17, 2019, which establishes the deadline for the initial brief and designation of matter to be included in the record on appeal as May 17, 2019. We are requesting an additional thirty (30) days which would make the new deadline June 17, 2019.

In response to your letter dated April 24, 2019, a copy of which we pulled from the Court's online record, enclosed please find a copy of the Notice of Appeal filed with Richland County's Court of Common Pleas.

By copy of this correspondence, we are serving counsel for the Respondent with a copy of the same.

1052 North Church Street Greenville SC 29601	PO Box 10529, Greenville SC 29603	p 864 349 2600 f 864 349 0303
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We appreciate the Court's time and consideration of this request. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

ROE CASSIDY COATES & PRICE PA

A handwritten signature in black ink, appearing to read "J. Hudson", written over the printed name below.

Joshua J. Hudson, Esq,

JJH/ads

Enclosures (*as stated*)

CC: Robert Goings, Esq.  
Jessica Gooding, Esq.

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**Roe Cassidy  
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PO Box 10529  
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**Hon. Jenny Abbott Kitchings  
Clerk of Court  
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