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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

The Honorable Lawton McIntosh

Appellate Case No. 2019-000905

RECEIVED
DEC 02 2019
SC Court of Appeals

J. Morgan Kears, Personal Representative of the Estate of G.H. Kears,..... Appellant,

v.

The Kears Family Education Trust, William Gordon Kears, Elizabeth Kears Gooding, Julia Kears Sharp, Rachael Kears Best, Joseph Weber Kears, and John Morgan Kears, of which all are named individually and as Trustees of the Kears Family Education Trust U/A/D Nov. 05, 1992..... Respondents.

FIRST MOTION FOR EXTENSION BY RESPONDENT ELIZABETH KEARSE GOODING,
INDIVIDUALLY AND AS TRUSTEE OF THE KEARSE FAMILY EDUCATION TRUST
U/A/D NOV. 05, 1992

Respondent Elizabeth Kears Gooding, Individually and as Trustee of the Kears Family Education Trust U/A/D Nov. 05, 1992, moves this Court for a thirty-day extension in which to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. This is Respondent's first request for an extension. Respondent's Initial Brief is currently due on Monday, December 2, 2019. Respondent respectfully requests an extension of thirty days, making the Initial Brief and Designation of Matter due on Thursday, January 2, 2020.

Respectfully submitted,

Kathleen C. Barnes

Kathleen Chewning Barnes, SC Bar No. 78854
BARNES LAW FIRM, LLC
P.O. Box 897

November 26, 2019

Hampton, SC 29924
803-943-4529

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Attorneys for Respondent Elizabeth Kearse Gooding

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PROOF OF SERVICE

The undersigned certifies that a copy of *First Motion for Extension by Respondent Elizabeth Kears Gooding, Individually and as Trustee of the Kears Family Education Trust U/A/D Nov. 05, 1992*, has been served upon counsel listed below by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below on November 26, 2019.

Kenneth B. Wingate
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SWEENEY, WINGATE & BARROW, P.A.
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John Morgan Kears
P.O. Box 521
Allendale, SC 29810

Dated: November 26, 2019

By: Kathleen C. Barnes
Kathleen Chewning Barnes, SC Bar No. 78854
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Hampton, SC 29924
803-943-4529

B A R N E S
LAW FIRM | LLC

Kathleen C. Barnes
Admitted: Georgia | South Carolina

November 26, 2019

The Honorable Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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Via U.S. Mail

Re: *J. Morgan Kearsse, Personal Representative of the Estate of G.H. Kearsse v. The Kearsse Family Education Trust, et al.*, Appellate Case No. 2019-000905


Dear Mrs. Kitchings:

Enclosed for filing please find the original and one copy of *First Motion for Extension by Respondent Elizabeth Kearsse Gooding, Individually and as Trustee of the Kearsse Family Education Trust U/A/D Nov. 05, 1992*, in the above-referenced case. Also enclosed is proof of service of the Motion and the filing fee. Please file the documents and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving counsel of record and pro se parties with a copy of the same. If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,

BARNES LAW FIRM, LLC



Kathleen C. Barnes

cc: Kenneth B. Wingate
Matthew J. Myers
Daniel A. Speights
Stephen M. Slotchiver
William Gordon Kearsse
Rachael Kearsse Best
Joseph Weber Kearsse
John Morgan Kearsse

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The Honorable Jenny Abbott Kitchings
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