

91793

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

DEC 31 2019

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Lawton McIntosh

Appellate Case No. 2019-000905

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.

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

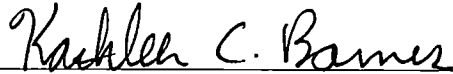
Respondent Elizabeth Kears Gooding, Individually and as Trustee of the Kears Family Education Trust U/A/D Nov. 05, 1992, moves this Court for a second thirty-day extension in which to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. This is Respondent's second request for an extension. Respondent's Initial Brief is currently due on Thursday, January 2, 2020. Respondent respectfully requests an extension of thirty days, making the Initial Brief and Designation of Matter due on Monday, February 3, 2020.

In anticipation of Appellant's opposition to this motion, Respondent notes that the first motion for an extension was timely made. When the undersigned counsel became involved in this case and contacted the Court, the case handler informed counsel that Mr. Hewitt's motion to

withdraw as counsel held all filing deadlines in abeyance and that the thirty-day time period in which to file Respondent's brief would begin after the Court ruled on the motion. The first motion for an extension was filed within 30 days of the Court ruling on that motion. The first motion and this motion are timely filed. No further extensions will be requested absent extraordinary circumstances.

December 27, 2019

Respectfully submitted,



Kathleen Chewning Barnes, SC Bar No. 78854
BARNES LAW FIRM, LLC
P.O. Box 897
Hampton, SC 29924
803-943-4529

Stephen M. Slotchiver
SLOTCHIVER & SLOTCHIVER, LLP
751 Johnnie Dodds Blvd, Ste. 100
Charleston, SC 29464

Attorneys for Respondent Elizabeth Kears Gooding

BARNES

LAW FIRM | LLC

Kathleen C. Barnes

Admitted: Georgia | South Carolina

RECEIVED

DEC 31 2019

SC Court of Appeals

December 27, 2019

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

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

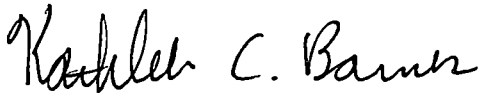
Dear Mrs. Kitchings:

Enclosed for filing please find the original and one copy of *Second 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 \$50.00 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
Whitney B. Harrison
William Gordon Kearsse
Rachael Kearsse Best
Joseph Weber Kearsse
John Morgan Kearsse

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

DEC 31 2019

SC Court of Appeals

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

The Honorable Lawton McIntosh

Appellate Case No. 2019-000905

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.

PROOF OF SERVICE

The undersigned certifies that a copy of *Second 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 December 27, 2019, to each party’s attorney or pro se individual. All service is made to the parties in their individual capacities and as Trustees.

Kenneth B. Wingate
Matthew J. Myers
SWEENEY, WINGATE & BARROW, P.A.
P.O. Box 12129
Columbia, SC 29211

Daniel A. Speights
SPEIGHTS & RUNYAN
P.O. Box 685
Hampton, SC 29924

Stephen M. Slotchiver
SLOTCHIVER & SLOTCHIVER, LLP
751 Johnnie Dodds Blvd, Ste. 100
Charleston, SC 29464

William Gordon Kears
P.O. Box 221
Fairfax, SC 29827

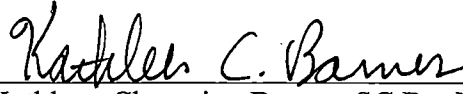
Rachael Kears Best
5055 Lakeshore Drive
Columbia, SC 29206

Joseph Weber Kears
6620 Merrill Road
Columbia, SC 29209

John Morgan Kears
P.O. Box 521
Allendale, SC 29810

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201

December 27, 2019

By: 
Kathleen Chewning Barnes, SC Bar No. 78854
P.O. Box 897
Hampton, SC 29924
803-943-4529

BARNES

LAW FIRM I L L C

P.O. Box 897 1 13 Mulberry Street East
Hampton, SC 29924



1000

29211

U.S. POSTAGE PAID
FOR DEBIT
HAMPTON, SC
29924
DEC 27, 19
AMOUNT
\$1.30
R2305K141067-10

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

RECEIVED

DEC 31 2019

SC Court of Appeals