

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas  
Clifton Newman, Circuit Court Judge

RECEIVED

JAN 16 2020

SC Court of Appeals

Case No. 2018-CP-06-00383

United States of America.....Respondent,

v.

Edgar Payton, Willie Payton, Hattie Payton, F. Hamilton Dicks,  
III, the United States of America, acting through the Small Business  
Administration, successors in interest to Still & Williams, Inc.,  
SC Electric & Gas Co., and David Payton.....Defendants,

Of Whom, Edgar Payton is ..... Appellant.

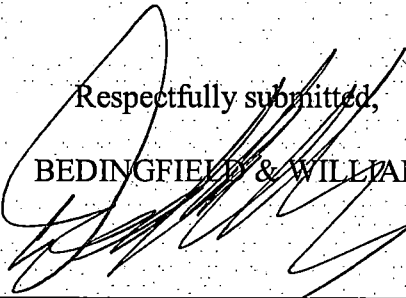
**MOTION FOR EXTENSION TO FILE BRIEF**

The Appellant moves for a 30-day extension to file his initial brief in this matter. The grounds for this motion are Appellant's counsel was on vacation from December 30, 2019 to January 6, 2020, and has a jury trial (hopefully) beginning the week of January 27, 2020, for which he needs time to prepare. Appellant received the transcript of record on December 26, 2019, by email. Appellant's counsel has communicated with other counsel regarding this request and counsel for the Respondent USA, as well as counsel for the Respondents Hattie, David, and Willie Payton, have consented. Other counsels of record have not responded.

Respectfully submitted,

BEDINGFIELD & WILLIAMS, LLC

By:

  
DANIEL W. WILLIAMS (SC Bar #10233)  
40 Wall Street  
PO Box 616  
Barnwell, SC 29812  
(803) 259-2759  
Fax: (803) 259-5922  
[dan@danwilliamsllc.com](mailto:dan@danwilliamsllc.com)

Counsel for Appellant

Barnwell, South Carolina

**Counsel of Record for Other Parties**

Katherine McLean Ryan, #101063  
Walker H. Willcox, #72608  
WILLCOX, BUYCK, & WILLIAMS, P.A.  
PO Box 1909  
Florence, SC 29503-1909  
(843) 662-3258

Martha M. Rivers, Esquire  
RIVERS LAW, LLC  
12923 Main St.  
Williston, SC 29853  
(803) 266-2290

Matthew J. Modica, #10226  
Assistant United States Attorney  
151 Meeting St., Suite 200  
Charleston, SC 294014  
(843) 266-1676

Jay E. Bressler  
SCANA Services, Inc.  
220 Operation Way, Mail Code C222  
Cayce, SC 29033  
(803) 217-9816

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas  
Clifton Newman, Circuit Court Judge

**RECEIVED**  
JAN 16 2020  
SC Court of Appeals

---

Case No. 2018-CP-06-00383

---

United States of America.....Respondent,

v.

Edgar Payton, Willie Payton, Hattie Payton, F. Hamilton Dicks,  
III, the United States of America, acting through the Small Business  
Administration, successors in interest to Still & Williams, Inc.,  
SC Electric & Gas Co., and David Payton.....Defendants,

Of Whom, Edgar Payton is ..... Appellant.

---

PROOF OF SERVICE

---

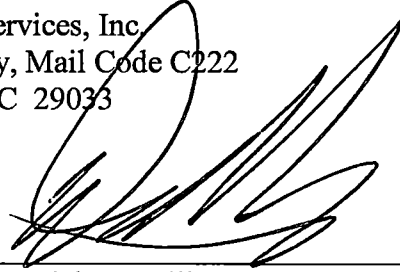
I certify that I have served the Motion for Extension to File Brief by depositing a copy of it in the United States Mail, postage prepaid, on January 14, 2020, addressed to the following:

Katherine McLean Ryan, #101063  
Walker H. Willcox, #72608  
WILLCOX, BUYCK, & WILLIAMS, P.A.  
PO Box 1909  
Florence, SC 29503-1909

Martha M. Rivers, Esquire  
RIVERS LAW, LLC  
12923 Main St.  
Williston, SC 29853

Matthew J. Modica, #10226  
Assistant United States Attorney  
151 Meeting St., Suite 200  
Charleston, SC 294014

Jay E. Bressler  
SCANA Services, Inc.  
220 Operation Way, Mail Code C222  
Cayce, SC 29033

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

Daniel W. Williams  
Attorney for Appellant  
Post Office Box 616  
Barnwell, South Carolina 29812  
(803) 259-2759

January 14, 2020  
Barnwell, South Carolina

LAW OFFICES  
*Bedingfield &*  
**WILLIAMS, LLC**

WALTER BEDINGFIELD  
(1938-2002)

DANIEL W. WILLIAMS

January 13, 2020

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

RECEIVED  
JAN 16 2020  
SC Court of Appeals

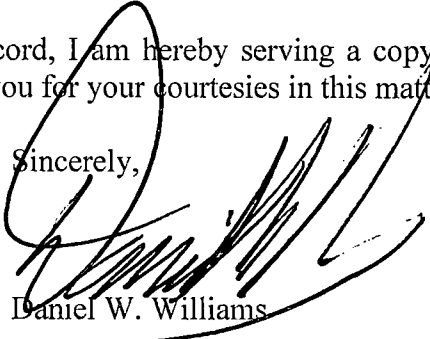
Re: United States of America vs. Edgar Payton, Willie Payton, Hattie Payton, F. Hamilton Dicks, III, the United States of America, acting through the Small Business Administration, successors in interest to Still & Williams, Inc., SC Electric & Gas Co., and David Payton  
Civil Action Number: 2018-CP-06-00383

Dear Ms. Kitchings:

In connection to the above aforesaid matter, you will find with required filing fee of \$50.00, the original and seven (7) copies of a Motion for Extension to File Brief with Proof of Service prepared in this matter. Please file the original and return one (1) clocked-in copy of the same to me in the stamped reply envelope provided.

By copy of this letter to all counsel of record, I am hereby serving a copy of the Motion for Extension to File Brief upon them. Thank you for your courtesies in this matter.

Sincerely,

  
Daniel W. Williams

DWW:ar  
Enc.

cc: Katherine McLean Ryan, Esquire  
Walker H. Willcox, Esquire  
WILLCOX, BUYCK, & WILLIAMS, P.A.  
PO Box 1909  
Florence, SC 29503-1909

The Hon. Jenny Abbott Kitchings  
January 13, 2020  
Page 2

Martha M. Rivers, Esquire  
RIVERS LAW, LLC  
12923 Main St.  
Williston, SC 29853

Matthew J. Modica, Esquire  
Assistant United States Attorney  
151 Meeting St., Suite 200  
Charleston, SC 294014

Jay E. Bressler, Esquire  
SCANA Services, Inc.  
220 Operation Way, Mail Code C222  
Cayce, SC 29033



DANIEL WILLIAMS  
PO BOX 616  
BARNWELL, SC 29812

RECEIVED  
JAN 14 2020  
SC Court of Appeals



The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629