

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM BEAUFORT COUNTY

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APPELLATE CASE NO. 2019-001676

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CHARLES E. HOUSTON JR

APPELLANT

v.

DEAN B. BELL, INDIVIDUALLY;  
THE LAW OFFICES OF DEAN B. BELL, LLC AND  
HAMMEL PROPERTIES, LLC

RESPONDENTS

---

APPELLANT'S AFFIDAVIT IN SUPPORT OF MOTION FOR EXTENSION  
OF TIME TO FILE APPELLANT'S INITIAL BRIEF

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STATE OF GEORGIA  
COUNTY OF FAYETTE

I, Charles E. Houston, Jr. upon first being duly sworn, deposes and states  
the following:

1

I am the Appellant in the action herein and submit this affidavit in support  
of my motion for an extension of time to serve and file the Appellant's Initial Brief.

2

That the transcript of record was e-mailed to me on December 30, 2019 during  
the Christmas Holidays during which time I would casually review my emails did  
not observe it. of it at that time and did not notice it had been sent until January 4,

2020 when I copied on an email from an opposing counsel requesting that their office had not been furnished with a copy they had previously ordered.

3

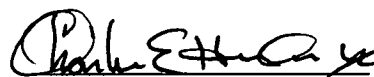
Additionally, during January 2020 my routine scheduled has been unexpectedly disrupted by having to travel out of town twice for funerals; the latest being a trip to Charleston, SC last week to attend the wake services for Walter Bilbro, Jr. Esquire along with combating severe post-surgical maladies to the extent of being prescribed Oxycodone/Acetaminophen 5-325mg tabs while also attempting to purchase a home in South Carolina where I intend to shortly return.

4

That upon completing the legal research of the issues to be presented in this appeal and the statutes and cases that will be cited as authority in support thereof it has come to my attention that the Initial Brief needs and should to be revised as the Final brief is locked into the Initial Brief as submitted. The remaining task consist primarily of compositional editing and fulfillment of the formatting requirements required by the SCRAP.

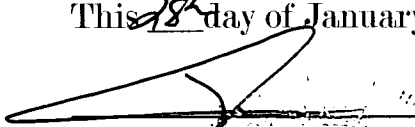
5

That I have not sought any prior extensions of time to file the Initial Brief and will extent every effort to file and serve it within or before the fifteen days requested extension time period.



Charles E. Houston Jr.

Subscribed and sworn before me  
This 28<sup>th</sup> day of January 2020



Notary Public for Georgia

My Commission expires **Jacqueline N Woods**  
**Notary Public, Douglas County Georgia**  
**My Commission Expires August 3rd, 2020**

Charles E. Houston, Jr.  
100 Shady Brooke Walk  
Fayetteville, Georgia 30214

843-684-0211

[emailcharleshouston@aol.com](mailto:emailcharleshouston@aol.com)

January 28, 2020

Hon. Jenny Abbott Kitchings  
Clerk of Court  
The South Carolina Court of Appeals  
P.O. Box 1629  
1220 Senate Street  
Columbia, South Carolina 29201

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JAN 31 2020  
SC Court of Appeals

*Re: Appellate Case # 2019-001676  
Charles E. Houston Jr. V. Dean B. Bell, et al  
Motion for Extension of Time*

Dear Ms. Kitchings:

We are submitting for filing with the Court the original, and six (6) copies of the Appellant's Motion for an Extension of Time to File and Serve the Initial Brief with Affidavit in support thereof annexed, along with the Certificate of Service and a check for \$50.00 to cover the motion filing fee; in the above referenced case.

Please clock stamp this filing and return a copy in the self-addressed envelope provided.

By copy of this letter I have furnished and served a copy of the same upon the Respondents' counsels as indicated on the Certificate of Service.

With kind regards, I remain  
Respectfully

  
Charles E. Houston, Jr.

cc: W. Cliff Moore III Esq.  
Thomas C. Taylor, Esq.  
Dean B. Bell, Esq.

Encls: as stated

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Charles E. Houston Jr.  
100 Shady Brooke Walk  
Fayetteville, Georgia 31402

Hon. Jenny Albright Kitchings  
Clerk of Court  
The South Carolina Court of Appeals  
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