

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM YORK COUNTY
CIRCUIT COURT

Daniel D. Hall, Circuit Court Judge

Case No. 2017-CP-46-01964
Appellant Case No. 2020-000027

Winston Shell.....Respondent,

vs.

Nathaniel Shell.....Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for a 60-day extension in which to file his Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Respondent is currently due on April 13, 2020. If the extension is granted, the Initial Brief of Respondent will be due on June 12, 2020. This motion is based on the fact that T. Jeff Goodwyn, Jr., Esquire was not the trial attorney for the trial held on December 10, 2019. As a result, Mr. Goodwyn is not in possession of the exhibits presented at trial and the trial transcript received does not include the trial exhibits. Mr. Goodwyn has requested the trial exhibits from the York County Clerk of Court but due to the restrictions placed on the Court due to the virus pandemic, it is taking longer than expected to receive the requested exhibits.

This Motion is supported by the pleadings on file with the Court, the South Carolina Rules of Civil Procedure, and such case law or memoranda as may be submitted to the Court.

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr. / SC Bar No. 73789

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jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina
April 7, 2020

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CIRCUIT COURT

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Case No.: 2017-CP-46-01964
Appellant Case No.: 2020-000027

Winston Shell.....Respondent,

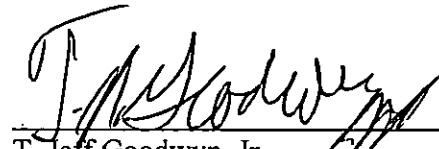
v.

Nathaniel Shell.....Appellant.

PROOF OF SERVICE

I certify that I have served the **Motion for Extension of Time to File Initial Brief and Designation of Matter** on Beverly A. Carroll, Esquire, Counsel for the Respondent, via facsimile and at the address listed below by depositing a copy of same in the United States Mail, postage prepaid, on April 7, 2020.

Beverly A. Carroll, Esquire
Morton & Gettys
P.O. Box 707
Rock Hill, SC 29731
Facsimile No.: (803) 366-4044)



T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
Attorney for Appellant

April 7, 2020

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
C. David Beale, Jr.*

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*Also Licensed in Georgia

April 7, 2020

VIA FACSIMILE: (803) 734-1839 & MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Winston Shell v. Nathaniel Shell*
Appellate Case No.: 2020-000027
Our File No.: 8000-0555

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SC Court of Appeals

Dear Ms. Kitchings:


This letter is to request a 60 day extension of the deadline to file the Appellant's Initial Brief and Designation of Matter in the above referenced matter. The current due date for this filing is on April 13, 2020.

This is the first request for an extension by the Appellant for this filing. Please advise the parties counsel as to any Orders issued either granting or denying this request for extension as soon as possible.

By copy of this letter to Beverly A. Carroll, Esquire, Counsel for Respondent, I am notifying her of this request.

Should you have any questions, please do not hesitate to contact me.

Sincerely,


T. Jeff Goodwyn, Jr.

TJG/msb
Enclosure


cc: Beverly A Carroll, Esquire (Fax #: (803) 366-4044 & Mail)

Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, S.C. 29205

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The Honorable Jenny Abbott Kitchings
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