

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE HAMPTON COUNTY
COURT OF COMMON PLEAS

HONORABLE CARMEN T. MULLEN
HAMPTON COUNTY COURT OF COMMON PLEAS

CASE NO.: 2018-CP-25-00508

RECEIVED
APR 20 2020
SC Court of Appeals

In Re: Estate of Laura Brown:

Alexa Naomi Garner Brown

Appellant,

vs.

St. Jude Apostolic Faith Church of God and Michael Brown,

Respondents.

APPELLANT'S RETURN TO RESPONDENTS'
MOTION TO DISMISS APPEAL

The Respondents have moved to dismiss this appeal. The Return to this motion is filed on behalf of the Appellant in opposition to said motion.

In their motion, the Respondents request that the appeal be dismissed "for the Appellant's failure and refusal to comply with the Appellate Court Rules." Pursuant to the Order of the Supreme Court of South Carolina dated March 20, 2020 regarding *Operation of the Appellate Courts During the Coronavirus Emergency*, the Court ordered:

"(I) Extensions of Time and Forgiveness of Procedural Defaults.

(1) Extensions of Time. Both the Supreme Court and Court of Appeals are aware that this crisis will increase the need for extensions to be granted. While this order remains in effect, no filing fee will be required for a motion for an extension. Further, since it is important for lawyers and self-represented

litigants appearing before the Appellate Courts to have time to take actions to protect themselves and their families, the due dates for all Appellate Court filings due on or after the effective date of this order are hereby extended for twenty (20) days. Lawyers and litigants are warned that this extension does not extend the time to serve a notice of appeal under Rule 203, 242, and 247, SCACR."

Order, pg. 5.

The Appellant intends to file her Initial Brief and Designation of Matter within the next couple of days.

It is accordingly respectfully requested that the motion of the Respondents to dismiss the appeal be denied.

MOSS, KUHN & FLEMING, P.A.

By: 

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Beaufort, South Carolina
April 15, 2020

Attorneys for the Appellant

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CERTIFICATE OF SERVICE

Undersigned certifies that the **Appellant's Return to Respondents' Motion to Dismiss Appeal**, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Sean Michael Bolchoz, Esquire
Bolchoz Law Firm
Post Office Box 22650
Hilton Head Island, South Carolina 29925

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on April 15, 2020.

By: 
Sue Radford

LAW OFFICES

MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
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*ALSO MEMBER OF GA BAR

April 15, 2020

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SC Court of Appeals

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

RE: Alexa Naomi Garner Brown v. St. Jude Apostolic Faith Church of God and
Michael Brown
Appellate Case No.: 2020-000504

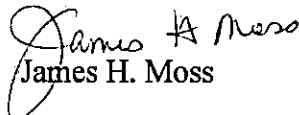
Dear Mrs. Kitchings:

Enclosed for filing is the original and one (1) copy Appellant's Return to Respondents' Motion to Dismiss Appeal and Certificate of Service. Please file the enclosures and return the clocked copy to me in the enclosed self-addressed stamped envelope. By copy of this letter and the enclosures, I am serving a copy of the same on Sean Michael Bolchoz, Esquire, Attorney for the Respondents.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.

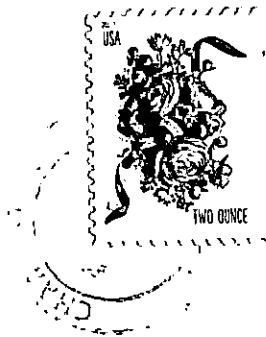

James H. Moss

JHM:sr
Enclosures

cc: Sean Michael Bolchoz, Esquire (w/enclosures)

HFK
MOSS, KUHN & FLEMING, P.A.
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Beaufort, SC 29901-0507

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Clerk, South Carolina Court of Appeals
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