

STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JUL 20 2020  
SC Court of Appeals

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

The Honorable Doyet A. Early, III Circuit Court Judge

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Appellate Case No. 2019-000362

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Adele J. Pope,

Appellant,

v.

Estate of James Brown and The James Brown 2000 Irrevocable Trust, Respondents.

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**MOTION FOR EXTENSION OF TIME TO FILE AMENDED RECORD ON APPEAL**

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Appellant moves, pursuant to Rules 240 and 263(b), *SCACR*, for a 30-day extension of time in which to serve and file the Amended Record on Appeal herein. The grounds for this motion are as follows:

1. By Order of July 8, 2020, this Court required an Amended Record on Appeal to be served and filed herein by August 7, 2020.
2. The record in this case is substantial, including a trial transcript exceeding 2,700 pages.
3. Appellant's counsel is a sole practitioner without staff, and enlists outside assistance in assembling, copying and binding records on appeal. One of the people who traditionally assists is currently recovering from a symptomatic case of COVID-19.

4. Further, Appellant's counsel has appellate and trial court deadlines in several other matters and has a battery of medical tests scheduled out of town shortly before the current due-date.
5. For these reasons, Appellant moves this Court to extend the deadline for the filing of the amended Record on Appeal for thirty (30) days, making it due on September 7, 2020.

### **Conclusion**

For the reasons set out herein, Appellant asks that this Court grant the requested extension.

Respectfully submitted,

s/Adam T. Silvernail  
Adam T. Silvernail  
Law Office of Adam T. Silvernail, LLC  
Post Office Box 7995  
Columbia, South Carolina 29202  
Telephone (803) 799-1770  
[adam@silvernailfirm.com](mailto:adam@silvernailfirm.com)  
S.C. Bar No. 80219

*Counsel for Appellant Adele J. Pope*

July 21, 2020

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**PROOF OF SERVICE**

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The undersigned counsel for Appellant certifies that he has served a copy of the Motion for Extension of time to file the Record on Appeal on all Respondents on the date shown below, by hand-delivery, addressed as follows:

J. David Black (Bar No. 68499)  
Kirsten E. Small (Bar No. 75681)  
NEXSEN PRUET, LLC  
1230 Main Street, Suite 700  
Columbia, South Carolina 29201  
(803) 771-8900

*Counsel for Respondents*

s/Adam T. Silvernail

Adam T. Silvernail

July 21, 2020

Law Office of  
**ADAM T. SILVERNAIL LLC**  
PO Box 7995  
Columbia, SC 29202

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