

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Jennifer B. McCoy, Circuit Court Judge

RECEIVED

Aug 03 2020

SC Court of Appeals

In Re: Estate of Stephen Day Ward, Jr.
Mary K. Ward a/k/a Mary Kimberly Ward Respondent,

v.

Stephanic Ward Cibinic, David D. Ward,
and Brian C. Ward, Co-Personal Representatives Appellants.

Appellate Case No. 2019-0021214

MOTION FOR EXTENSION OF TIME

The undersigned would respectfully state unto this Honorable Court:

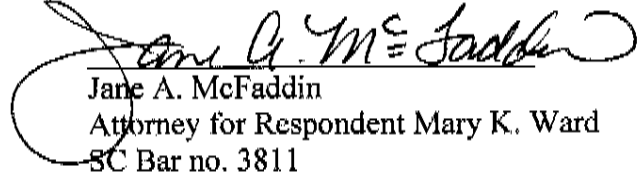
1. That the undersigned, as attorney for Respondent Mary K. Ward, by and through her conservator and legal representative, Ann Noble-Kiley, previously filed a Motion with this Court on July 13, 2020 requesting an extension of time to file Respondent's initial Brief and related filings, due to the death of Mary K. Ward and the necessity of substituting the proper legal party as Respondent in the instant appeal.
2. That by Order of V. Claire Allen, Clerk for the South Carolina Court of Appeals, filed July 14, 2020, Respondent was granted an extension of time for serving and filing Respondent's initial brief and designation of matter until August 3, 2020.
3. That as of July 31, 2020, the undersigned has not received any notice of appointment of a Personal Representative for the Estate of Mary K. Ward, deceased, and is informed and believes such application is still pending in the Essex (Mass.) Probate

and Family Court, as per the statement of Jessica A. Wistran, Esquire, dated July 31, 2020, and attached hereto as Exhibit A.

4. That the undersigned requests a further extension of time to file and serve Respondent's initial brief and designation of matter to Monday, August 31, 2020.

3rd day of August, 2020

Respectfully submitted,


Jane A. McFaddin
Attorney for Respondent Mary K. Ward
SC Bar no. 3811

P.O. Box 1124
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GLOVSKY

Counselors-at-Law

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Direct Dial (978) 720-3114
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July 31, 2020

Attorney Jane A. McFaddin
PO Box 1124
Charleston, SC. 29402

Re: Estate of Mary K. Ward

Dear Attorney McFaddin:

The Petition for Probate of Will for the Estate of Mary K. Ward is still pending with the Essex County Probate and Family Court ("Court"). The Court is operating at diminished capacity because of the COVID-19 emergency and therefore, matters are being delayed. Additionally, we cannot simply appear at the Court see the judge to move matters along as we once could do. We hope to have the Petition for Probate of Will approved by the Court and an Order appointing Ms. Kiley as Personal Representative within the next few weeks.

Thank you for your patience.

Sincerely yours,

Jessica A. Wisran

Jessica A. Wisran

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SC Court of Appeals

Jane A. McFaddin
Attorney and Counselor at Law

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Charleston, S.C. 29402
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Charleston, S.C. 29407
Fax (843) 556-4429

S. C. Court of Appeals

TO: Hon. Jenny Abbott Kitchings

FROM: Jane A. McFaddin, Esq.

FAX NUMBER: 803 734-1839

FAX NUMBER: 843 556-4429

PHONE: _____

PAGES: 4 includes cover page

In Re: Estate of Stephen D. Ward, Jr.

DATE: August 3, 2020

Appellate case no. 2019-0021214

cc: Amanda Bailey, Esq.
George E. Morrison, Esq.

Urgent For Review Please Comment Please Reply
(843) 722-3227

*Comments:

Dear Ms. Kitchings:

Please find enclosed a Motion for Extension of Time, with Exhibit. Thank you for filing this with the Court, and for your consideration in this matter.

Sincerely,
Jane A. McFaddin

*If you do not receive total number of pages, please call (843)556-3333.

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