

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

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AUG 07 2020

SC Court of Appeals

Case No. 2019-CP-04-00337

Frances K. Chestnut, Elizabeth Diane Keese,
Sylvester Keese, Arthur B. Keese and Mary K. Taylor,

Respondents.

v.

Florence Keese, Marcy Keese, Margo Keese and
Marshall Keese, pro se,

Appellants.

MOTION TO INCLUDE RESPONDENTS'
DESIGNATION OF MATTER INTO RECORD ON APPEAL AND
MOTION FOR EXTENSION OF TIME TO FILE FINAL RESPONDENTS' BRIEF

Pursuant to Rule 210(c), SCACR, the Respondents hereby move the Court for an Order requiring the Appellants to include all of the documents contained in the Respondents' Designation of Matter to be Included in the Record on Appeal.

The Respondents included four items in their Designation of Matter to be Included in the Record on Appeal that were not included in the actual Record on Appeal submitted by the Appellants. These items are the following: 3. Respondents' Return to the Motion to Set Aside Default Judgment; 4. Appellants' Affidavit of Richard Margolis provided at hearing of December 12, 2019 on Motion to Set Aside Default Judgment; 5. Appellants' Affidavit of Marshall Keese provided at hearing of December 12, 2019 on Motion to Set Aside Default Judgment; and 6.

Appellants' Affidavit of Florence Keese provided at hearing of December 12, 2019 on Motion to Set Aside Default Judgment.

The Respondents respectfully request that the Court Order the Appellants to submit a Record on Appeal with the items included.

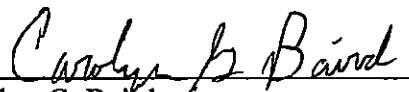
Further, the Respondents' would also move for an Order granting a forty-five (45) day extension of time in which to file the Final Respondents' Brief due to all documents not being included in the Record on Appeal.

The Respondents' Final Brief was due on August 12, 2020. Therefore, with the extension, the new deadline would be September 28, 2020.

Respondents' counsel would show to the Court that the pro se Appellants pursuant to a letter from the Court dated July 31, 2020 were to correct other deficiencies and believes that no objection would be made for the Court to grant this extension.

Respectfully submitted,

August 6, 2020

By: 
Carolyn G. Baird
S.C. Bar No. 480
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Anderson, SC 29622
864-224-3474
Attorney for the Respondents

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Case No. 2019-CP-04-00337

Frances K. Chestnut, Elizabeth Diane Keese,
Sylvester Keese, Arthur B. Keese and Mary K. Taylor, Respondents.

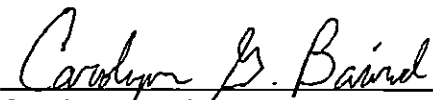
v.

Florence Keese, Marcy Keese, Margo Keese and
Marshall Keese, pro se, Appellants.

PROOF OF SERVICE

I certify that I have served the Motion to Include Respondents' Designation of Matter into the Record on Appeal and Motion for Extension of Time to File Final Respondents' Brief on Florence Keese, Mary Keese, Margo Keese and Marshall Keese, pro se Appellants, by depositing a copy of it in the United States Mail, postage prepaid, on August 6, 2020, 2020, addressed to Florence Keese, 1035 Ridgehaven Road, West Chester, Pennsylvania 19382; Mary Keese, 1035 Ridgehaven Road, West Chester, Pennsylvania 19382; Margo Keese, 11608 Stewart Lane, Apt 302, Silver Spring, Maryland 20904 and Marshall Keese, 1035 Ridgehaven Road, West Chester, Pennsylvania 19382, on August 6, 2020.

August 6, 2020



Carolyn G. Baird
PO Box 987
Anderson, SC 29622
864-224-3474
Attorney for Respondents

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SC Court of Appeals

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WILLIAM H. MOORHEAD-RETIRED
1984-2017

+ Certified Specialist in Taxation Law
** Also Admitted Kentucky

August 6, 2020

Jenny Abbott Kitchings
Clerk
The South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RE: Frances K. Chestnut v. Florence Keese
Appellate Case No. 2020-000263

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Respondents' Motion to Include Respondents' Designation of Matter into Record on Appeal and Motion for Extension of Time to File Final Respondents' Brief along with my Proof of Service. Please file the original of this document, stamp the file copy and return same to me in the envelope provided.

Should you have any questions, please let me know.

Sincerely yours,


Carolyn G. Baird

CGB/pcm

Enclosures

cc: Florence Keese
Marcy Keese
Margo Keese
Marshall Keese

