

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

Oct 01 2020

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

SC Court of Appeals

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

v.

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

Appellate Case No. 2019-0021214

MOTION FOR EXTENSION OF TIME

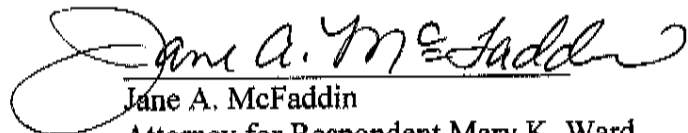
The undersigned would respectfully state unto this Honorable Court:

1. That the undersigned, as attorney for Respondent Mary K. Ward, by and through her former Conservator and legal representative, Ann Noble-Kiley, previously filed a Motion with this Court on August 3, 2020 requesting an extension of time to file all necessary Respondent's Briefs and related filings, due to the death of Mary K. Ward during the pendency of this appeal, and the necessity of substituting the proper legal party as ongoing Respondent.
2. That by Order of James E. Lockemy, Chief Judge, filed September 3, 2020, Respondent was granted an extension of time for serving and filing Respondent's Initial Brief and Designation of Matter until October 2, 2020.

3. That the undersigned, both through local counsel and personally, has continued to contact the Essex County (Mass.) Probate Court, by telephone and email, seeking any updated information on that court's docket, and particularly, the status of the present matter of the Respondent's Estate, but has been unable to obtain any substantive reply.
4. That as of October 1, 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 County (Mass.) Probate and Family Court, as per the statement of Jessica A. Wistram, Esquire, dated September 30, 2020, and attached hereto as Exhibit A.
5. That the undersigned requests a further extension of time to file and serve Respondent's initial brief and designation of matter to November 2, 2020.

1st day of October, 2020

Respectfully submitted,



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

P.O. Box 1124
Charleston, South Carolina 29402
jamcfaddin@bellsouth.net
(843) 556-3333

In re: Estate of Stephen Jay Ward, Jr.
et al
2019-0021214
Exhibit A

GLOVSKY

Counselors-at-Law

Jessica A. Wisran
jwisran@glovsky.com
Direct Dial (978) 720-3114
Direct Fax (978) 720-3168

September 30, 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 delayed. I have called the Court on many occasions to check the status, but the clerks are not permitted to move freely throughout the Court to check the status. I have also contacted the Assistant Judicial Case Manager for this case but have not received a definitive answer. I hoped to have the Petition for Probate of Will approved by the Court and an Order appointing Ms. Kiley as Personal Representative approved several months ago, but with the COVID-19 emergency operations, matters have slowed significantly and without a definitive timeline.

Thank you for your patience.

Sincerely yours,

Jessica A. Wisran

Jessica A. Wisran

Jane A. McFaddin
Attorney and Counselor at Law

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SC Court of Appeals

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S. C. Court of Appeals
TO: _Hon. Jenny A. Kitchings _
FAX NUMBER: _803 734-1839_
PHONE: _____

FROM: _Jane A. McFaddin, Esq. _____
FAX NUMBER: __843 556-4429 _____
PAGES: 4 includes cover page

In Re: _Estate of Stephen D. Ward, Jr. et al_
Case no. 2019-0021214

DATE: __October 1, 2020 _____
CC: _Amanda Bailey, Esq.
George W. Morrison, Esq.
(843) 722-3227

Urgent
Reply

For Review

Please Comment


Please

*Comments:

Dear Ms. Kitchings:

Please find enclosed my Motion for Extension of Time, with Exhibit, in the above-referenced Appeal. Thank you for filing this with the Court, and for your consideration of this matter.

Sincerely,



Jane A. McFaddin
Attorney and Counselor at Law

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

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