

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

Case No. 2018-CP-10-02963  
Appellate Case No. 2020-000195

**RECEIVED**

**Oct 07 2020**

**SC Court of Appeals**

Alice H. Anderson ..... Appellant,

v.

R. Michael Drose and Drose Law Firm..... Respondents.

**RESPONDENTS' OPPOSITION TO APPELLANT'S MOTION TO ALLOW LATE  
FILING**

R. Michael Drose and Drose Law Firm (“Respondents”), by and through undersigned counsel, oppose Alice H. Anderson’s Motion to Allow Late Filing, served by Edward Anderson on September 29, 2020. Respondents respectfully request that the Court apply the deadline set forth in its August 28, 2020 (the “Order”), which extended the initial briefing and designation of matter deadline to September 23, 2020. The extension set forth in the Order was not only the Court’s second extension to Appellant, it conditioned further extensions on “extraordinary circumstances.”

Appellant’s motion, attached hereto as Exhibit A, sets forth various reasons why Appellant has been unable to comply with the Order. However, it also explicitly states that Appellant mistakenly “thought the date to file the initial brief and designation of matter was

September 30 (sic) 2020; however, when [Appellant] spoke to the court clerk [he] was informed it was September 23, 2020.” (Exh. A at p. 5.)

Respondents and their counsel are sympathetic to Appellant’s circumstances. However, Respondents’ have had to contend with this Appeal since February 2020, and Appellant has yet to initiate briefing or retain counsel. As a result of the delays and extensions and in light of the Order, Respondents’ respectfully oppose Appellant’s Motion and request that this matter be dismissed.

October 7, 2020



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Joshua H. Umbarger  
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Attorneys for Respondents

THE STATE OF YOUTH CARE  
IN THE COURT OF APPEALS

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COURT OF COMMON PLEAS

Diane Gohmert-Goodstein, Circuit Court Judge

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Case No. 2020-000195

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Edward M. Anderson as Personal  
Representative of the Estate of  
Alicia H. Anderson,

Appellant

vs

Robert Michael Proff  
and Proff Law Firm

Respondent(s)



C

# MOTION TO ALLOW Late Filing for Initial Brief and Designation of Matter

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I, Edward M. Anderson, am  
submitting a Motion to  
allow a late filing bec-  
ause I had to travel  
from Hawaii Md to  
Minneapolis, MN on August  
29, 2020 to conduct

some business matters for  
my mother's funeral exp-  
enses; however, I encountered  
some family issues and a  
leaking roof which had  
to be replaced so I  
had to find a roof  
contractor to do a new  
roof. I encountered  
delays with the roof  
installation due to

the heat and rainy  
days/hurricane gales. I  
unexpectedly had to stay  
in SC longer than I  
expected and I returned  
to Maryland Sept-  
ember 23, 2020 to  
pay for the pickup  
car thank, but I kept  
the car beyond  
September 23, 2020.

(b)  
Due to the unexpected  
family issues, I have  
consulted with Attorney  
O'Bryan for guidance  
and this impacted my  
prolonged stay in SC  
also.

I thought the date  
to set the I-149/  
Prize and Designation

of Matter (Q)  
number 30 2020; how-  
ever when I spoke to  
the court clerk I  
was informed it was  
September 23, 2020.

I certify that I have  
the Motion to ~~FILE~~  
Allow late filing for

Initial Brief and Res-  
ignation of Matter on  
Joshua H. Umberger  
Clearhart Overstreet) by  
depositing a copy in  
the United States Mail,  
postage prepaid on  
September 29, 2020,  
addressed to Joshua  
H. Umberger of 1900,

Joshua H. Umberger  
Post Office Box 22523,  
Charleston, South Carolina  
29413 via Certified  
Mail.

I have enclosed a  
copy of the US Postal  
Money Order for  
\$50.<sup>00</sup> for the

(9)

Filing Fee of the  
Budget Car Rental  
Document also.

Ed M. A.

Edward M. Anderson  
as Personal Representative  
of the Estate of

Alice H. Anderson

P.O. Box 75435

Washington, DC 20013

(202) 731-0472

RENTAL AGREEMENT NUMBER 317777777

RECEIPT

YOUR INFORMATION

Customer Name : ANDERSON, ZYVAD  
Budget Corp. Div. : SOLVENT TECHNOLOGIES INC  
Methods Of Payment : VISA EV1231

YOUR VEHICLE INFORMATION

Budget Car Num : 9 A 3 0 : 7 6 2  
Plate Number : LA N55101A  
Veh Grp Charged : Full-Size  
Veh Grp Rented : Intermediate SUV  
Veh Description : BLU KIA SPORTAGE SUV  
Total Driven : 2604 Miles Odometer To: 19517 Miles  
Fuel Readings: Out 11.9 Gal | To 3.0 Gal

YOUR RENTAL

Pickup Date/Time : Aug 24 2022 10:00 AM  
Pickup Location : 13400 BALTIMORE AVENUE  
LAUREL, MD, 20622, US

Return Date/Time : SEP 01 2022 09:45 PM  
Return Location : 13400 BALTIMORE AVENUE  
LAUREL, MD, 20622, US

YOUR VEHICLE CHARGES:

NON	1 DAY	MAX	TAX	TIME AND MILEAGE
MT:	Unlimited			
WEEKLY:	31.00			
DAILY:	14.00	1754	14.00-	44.00
WEEKLY:	270.00			
WEEKLY:	280.00	1M08	280.00-	280.00
Time & Mileage:				204.00
TAXABLE FEES				
VEH LICENSE BROUVE	65.00			17.50
EXTENSION FEE	10.00			40.00
Optional Products/Services Taxable				100.00
Optional Charges:				100.00
Sales Tax (11.500%)				145.00
NON TAXABLE ITEMS				
Your Total Charges Paid:				1433.14
Prepayment:				.00
NEW CHARGES:			730	1120.14
Your Total Due:				2553.28
Fuel returned:	12040 MI	5.159 Gal		

YOUR OPTIONAL PRODUCTS/SERVICES

Loss Damage Waiver 10.00/Day Accepted  
Optional Services Total Payable = 100.00

-----NOTICES-----BUDGET-----NOTICES-----BUDGET-----NOTICES-----BUDGET-----NOTICES  
I agree to the rental charges above. I acknowledge additional charges could be added based on tolls, tickets, fines, administrative charges and other fees which may be applicable. X \_\_\_\_\_  
-----NOTICES-----BUDGET-----NOTICES-----BUDGET-----NOTICES-----BUDGET-----NOTICES

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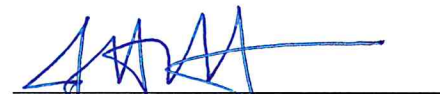
R. Michael Drose and Drose Law Firm..... Respondents.

**PROOF OF SERVICE**

I certify that I have served Respondents' Opposition to Appellant's Motion to Allow Late Filing depositing a copy of the same in the United States Mail, postage prepaid, on October 7, 2020, addressed as follows:

Edward Anderson  
P.O. Box 75435  
Washington, DC 20013  
Appellant *Pro Se*

October 7, 2020

  
\_\_\_\_\_  
Joshua H. Umbarger