

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Dec 01 2020**

**SC Court of Appeals**

APPEAL FROM BERKELEY COUNTY  
In the Court of Common Pleas for the Ninth Circuit

Roger M. Young, Sr., Circuit Court Judge

Appellate No. 2020-001354

Susan Brooks Knott Floyd.....Respondent

v.

Elizabeth Pope Knott Dross.....Appellant

APPELLANT’S FIRST MOTION FOR EXTENSION  
OF TIME TO FILE INITIAL BRIEF

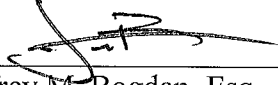
Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Elizabeth Pope Knott Dross, respectfully requests a thirty-day (30-day) extension of the deadline for serving the Initial Brief of Appellant. As grounds for the motion, Appellant counsel cites their present workload, and personal demands, and the recent coronavirus (COVID-19) resurgence. This is Appellant’s first request for an extension to file the Initial Brief.

The current deadline is December 2, 2020. With an extension, the deadline for service of the Initial Brief of Appellant will be January 4, 2021.

December 1, 2020

Respectfully submitted,

BARNWELL WHALEY  
PATTERSON & HELMS, LLC

By:   
Jeffrey M. Bogdan, Esq  
288 Meeting Street, Ste 200  
Charleston, SC 29401  
(843) 577-7700  
[jbogdan@barnwell-whaley.com](mailto:jbogdan@barnwell-whaley.com)

*Attorneys for Defendant/Appellant*

Other Counsel of Record:

Charles P. Summerall, IV, Esq.  
G. Trenholm Walker, Esq.  
P.O. Box 2216  
Charleston, SC 29413  
(843) 727-2200  
[walker@WGFLAW.com](mailto:walker@WGFLAW.com)  
[Summerall@WGFLAW.com](mailto:Summerall@WGFLAW.com)  
*Attorneys for Plaintiff/Respondent*

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Dec 01 2020**

**SC Court of Appeals**

APPEAL FROM BERKELEY COUNTY  
In the Court of Common Pleas for the Ninth Circuit

Roger M. Young, Sr., Circuit Court Judge

Appellate Case No. 2020-001354

Susan Brooks Knott Floyd.....Respondent

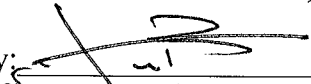
v.

Elizabeth Pope Knott Dross.....Appellant

PROOF OF SERVICE

I certify that I have served the Appellant’s First Motion for Extension of Time on Susan Brooks Knott Floyd, by depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorneys of record, Charles P. Summerall, IV and G. Trenholm Walker, at their office mailing address at Post Office Box 2216, Charleston, SC 29413, on December 1, 2020.

BARNWELL WHALEY  
PATTERSON & HELMS, LLC

By:   
Jeffrey M. Bogdan, Esq.  
288 Meeting Street, Ste 200  
Charleston, SC 29401  
jbodgan@barnwell-whaley.com  
(843) 577-7700

*Attorneys for Defendant/Appellant*

EST. 1938

# BARNWELL WHALEY

ATTORNEYS AT LAW

JEFFREY M. BOGDAN

MEMBER ATTORNEY

JBOGDAN@BARNWELL-WHALEY.COM

December 1, 2020

RECEIVED

Dec 01 2020

SC Court of Appeals

**VIA EMAIL and U.S. MAIL**

2823.011

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Susan Brooks Knott Floyd, Respondent vs. Elizabeth Pope Knott Dross, Appellant.  
Appellate Case No.: 2020-001354

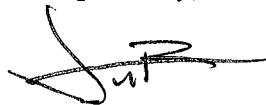
Dear Ms. Kitchings:

Please find enclosed for filing the unbound original *Appellant's Motion for Extension of Time to File Initial Brief* in the above-referenced matter. Pursuant to the Supreme Court's Amended Order "re: Operation of the Appellate Courts During the Coronavirus Emergency," I have not included any additional copies and no filing fee is enclosed for this Motion for Extension.

By copy of this letter to them, I am serving a copy of the Motion upon all counsel of record.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,



Jeffrey M. Bogdan

JMB/jgc  
Enclosures

cc: Charles P. Summerall, IV, Esq.  
G. Trenholm Walker, Esq.

{01047013.DOCX.1}

BARNWELL WHALEY PATTERSON & HELMS LLC

211 KING STREET, SUITE 300  
CHARLESTON, SC 29401  
P: 843-577-7700 F: 843-577-7708

201 NORTH FRONT STREET, SUITE 1003  
WILMINGTON, NC 28401  
P: 910-679-1388 F: 910-679-4663

BARNWELL-WHALEY.COM