

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

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

DEC 03 2020

Roger M. Young, Sr., Circuit Court Judge

SC Court of Appeals

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

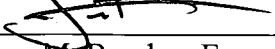
Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Elizabeth Pope Knott Dross, respectfully requests a thirty-day (30-day) extension of the deadline for serving the Initial Brief of Appellant. As grounds for the motion, Appellant counsel cites their present workload, and personal 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

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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
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EST. 1938

BARNWELL WHALEY

ATTORNEYS AT LAW

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December 1, 2020

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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

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

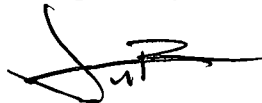
Dear Ms. Kitchings:

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}

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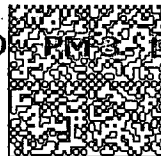
SC Court of Appeals

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The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

CHARLESTON SC 294

1 DEC 2020



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