

RECEIVED
Jan 22 2021
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the 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.

**RESPONDENT'S FIRST MOTION FOR EXTENSION
OF TIME TO FILE INITIAL BRIEF**

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

The current deadline is February 3, 2021. With an extension, the deadline for service of the Initial Brief of Respondent will be March 5, 2021.

Respectfully submitted,

WALKER GRESSETTE FREEMAN & LINTON, LLC

January 22, 2021

/s/Charles P. Summerall, IV

G. Trenholm Walker (SC Bar #5777)

Email: Walker@WGFLAW.com

Charles P. Summerall, IV (SC Bar #5433)

Email: Summerall@WGFLAW.com

P.O. Box 22167

Charleston, SC 29413

T: 843.727.2200

ATTORNEYS FOR PLAINTIFF/RESPONDENT

Other Counsel of Record:

Jeffrey Michael Bogdan, Esq.
Barnwell Whaley Patterson & Helms, LLC
Post Office Drawer H
Charleston, SC 29402
jbogdan@barnwell-whaley.com
(843) 577-7700

-and-

Joshua Steven Whitley, Esq.
Smyth Whitley, LLC
126 Seven Farms Drive
First Citizens Plaza, Suite 260
Charleston, SC 29492
jwhitley@smythwhitley.com
(843) 606-5635
(843) 606-5635

ATTORNEYS FOR DEFENDANT/APPELLANT

IN THE STATE OF SOUTH CAROLINA
In the 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

RECEIVED
Jan 22 2021
SC Court of Appeals

Susan Brooks Knott Floyd.....Respondent,

v.

Elizabeth Pope Knott Dross.....Appellant.

PROOF OF SERVICE

I certify that I have served the Respondent's First Motion for Extension of Time on Elizabeth Pope Knott Dross, by depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorneys of record, Jeffrey Bogdan and Joshua Steven Whitley, at their office mailing addresses at Post Office Box H, Charleston, SC 29402 and 126 Seven Farms Drive, Suite 260, Charleston, SC 29492, on January 22, 2021.

WALKER GRESSETTE FREEMAN & LINTON, LLC

/s/Charles P. Summerall, IV

G. Trenholm Walker (SC Bar #5777)

Email: Walker@WGFLAW.com

Charles P. Summerall, IV (SC Bar #5433)

Email: Summerall@WGFLAW.com

P.O. Box 22167

Charleston, SC 29413

T: 843.727.2200

ATTORNEYS FOR PLAINTIFF/RESPONDENT

January 22, 2021