

**RECEIVED**

AUG 12 2021

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell Scarborough, Master-in-Equity for Charleston County

Appellate Case No. 2018-001464

Vanessa Williams, Vanessa Williams, as Conservator and Guardian  
of Sandra P. Perkins, and Vanessa Williams, as Personal Representative  
of the Estate of Sandra P.  
Perkins.....Respondents,

v.

Bradford Q. Jeffcoat, Jr. and  
Blue Heron Builders,  
Inc.....Defendants,  
*of whom*  
Bradford Q. Jeffcoat, Jr.  
is.....Appellant.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME AND TO SERVE OUT OF  
TIME RESPONSE TO APPELLANT'S MOTION FOR A REHEARING AND  
SUGGESTION OF A REHEARING EN BANC**

Respondents, Vanessa Williams, Vanessa Williams, as Conservator and  
Guardian of Sandra P. Perkins, and Vanessa Williams, as Personal Representative of  
the Estate of Sandra P. Perkins, through their undersigned counsel, hereby respectfully  
move for an extension of time of 7 days to August 18, 2021 to file and serve a response  
to the Appellant's Request for a Rehearing and Suggestion for a Rehearing En Banc.

It appears the Court of Appeals clerk emailed undersigned counsel requesting a  
return to the motion, but that email letter was not seen by undersigned counsel in his

email box. If a copy was sent US Mail, it has not been received by either of the cc:'s on the letter. It was only today August 11, 2021, that I learned a response was requested. We will begin preparing a response immediately. I have communicated with opposing counsel who states he has no objection to this motion.

CLAWSON and STAUBES, LLC

s/Timothy A. Domin

Timothy A. Domin

Bar No.: 5828

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Charleston SC 29492

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Drew Wenzel

Caldwell Wenzel & Asthana, PC

218 N. Alston St.

Foley, AL 36535

Attorneys for Respondents

Charleston, South Carolina  
August 11, 2021

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Perkins.....Respondents,

v.

Bradford Q. Jeffcoat, Jr. and  
Blue Heron Builders,

Inc.....Defendants,

*of whom*

Bradford Q. Jeffcoat, Jr.

is.....Appellant.

CERTIFICATE OF SERVICE

I certify that I have served the **RESPONDENTS' MOTION FOR EXTENSION OF TIME AND TO SERVE OUT OF TIME RESPONSE TO APPELLANT'S MOTION FOR A REHEARING AND SUGGESTION OF A REHEARING EN BANC** upon the Defendants and Appellant herein by mailing same via U.S. First Class Mail, postage prepaid, on August 11, 2020, addressed to:

Jason Scott Luck  
Jason Scott Luck Attorney at Law  
PO Box 47  
Bennettsville, SC 29512

**CLAWSON  
AND STAUBES**  
LLC

Timothy A. Domin  
Licensed in SC  
tdomin@clawsonandstaubes.com

August 11, 2021

File No.: 20152399.000

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**SC Court of Appeals**

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

Re: Vanessa Williams and Vanessa Williams as Conservator and Guardian of  
Sandra P. Perkins vs. Bradford Q. Jeffcoat and Blue Heron Builders, LLC  
Appellate Case No.: 2018-001464

Dear Ms. Kitchings:

Enclosed please find an original and one copy of the Respondents' Motion for Extension of Time and to Serve out of Time Response to Appellant's Motion for a Rehearing and Suggestion of a Rehearing En Banc in the above-referenced case. Please file the original and return the file stamped copy to our office in the enclosed self-addressed stamped envelope. Should you have any questions, please do not hesitate to contact me.

Thank you very much for your attention to this matter.

Very truly yours,

CLAWSON and STAUBES, LLC

s/Timothy A. Domin  
Timothy A. Domin

TAD/CRK  
Enclosure

cc: Jason Scott Luck  
Drew Wenzel

\$1.10  
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Elizabeth B. York  
Post Office Box 9  
Darlington, SC 29540

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SC Court of Appeals

Ms. Jenny Abbott Kitchings, Esquire  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211-1629

