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AUG 19 2021

SC Court of Appeals

The State of South Carolina
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Benjamin H. Culbertson, Circuit Court Judge

Case No. 2020-001291

Julie Irving,

Respondent,

vs.

Jeanne Poafpybitty, Donald Matthew Rothgeb and Steven Taylor Rothgeb,

Defendants.

Of whom Jeanne Poafpybitty, Personal Representative of the
Estate of Donald M. Rothgeb is the Appellant,

MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S FINAL BRIEF AND RECORD ON APPEAL

AND NOW, comes Appellant, Jeanne Poafpybitty, by and through her undersigned counsel, and in support of this Motion for Extension of Time to File Appellant's Final Brief and Record on Appeal, avers as follows:

1. Appellant's Final Brief and Record on Appeal are currently due on August 17, 2021.

2. Counsel is in the process of compiling the Record on Appeal but due to the extensive size of the Record on Appeal and coordination of same with opposing counsel, Appellant will not be able to produce the Record on Appeal for filing by today's deadline.

3. Accordingly, it is respectfully requested that the Court grant an additional 10-day extension of time for the filing of Appellant's Final Brief and Record on Appeal that is currently pending and due on August 17, 2021.

4. Counsel for Respondent is in agreement with the filing of this request for extension and there will be no prejudice to Respondent in granting this extension of time to file Appellant's Final Brief and Record on Appeal, and Appellant does not believe that any additional extension will be necessary or requested.

5. This Motion is made in good faith, and is not sought for purposes of delay but so that justice may be served.

Accordingly, pursuant to Rule 263(b), Appellant requests that the Court grant an additional ten (10) days within which to file her Final Brief and Record on Appeal.

Respectfully submitted,



Reese R. Boyd, III, Esq. (SC Bar# 7151)

Bret H. Davis, Esq.

Davis & Boyd LLC

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Attorneys for the Defendant/Appellant,
Jeanne Poafpybitty.

August 17, 2021
Myrtle Beach, South Carolina

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CERTIFICATE OF SERVICE

I certify that on this date a copy of the foregoing APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S FINAL BRIEF AND RECORD ON APPEAL was served on each party or counsel of record by mailing or hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

This 17th day of August, 2021.



Catherine Plocinik, Paralegal
Davis & Boyd LLC

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TRANSMITTAL MEMORANDUM

To: SC. Court of Appeals
From: Reese Boyd III / Cathy Plocinik
Re: In the Estate of Donald M. Rothgeb
Date: August 17, 2021

Enclosed please find original and one copy of Motion for Extension of Time to File Final Brief and Record on Appeal. We are already in receipt of a stamped copy of the Motion that was submitted via email for filing on this date.

Thank you for your consideration and assistance in this matter. If you have any questions or concerns, please feel free to contact our office.

Yours sincerely,



Cathy Plocinik

DAVIS & BOYD, LLC

Post Office Box 70517

Myrtle Beach, South Carolina 29572

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SC Court of Appeals

Ms. Jenny Abbott Kitchings

S.C. Court of Appeals Clerk of Court

P.O. Box 11629

Columbia, SC 29211



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