

**RECEIVED**  
**Sep 24 2021**  
**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
The Honorable Deadra L. Jefferson, Circuit Court Judge  
Case No.: 2018-CP-10-0872

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Appellate Case No. 2019-002002

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Estate of Patricia B. Holliday.....Appellant,

v.

Ross S. Holliday.....Respondent.

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APPELLANT’S MOTION FOR EXTENSION OF TIME

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, The Estate of Patricia B. Holliday (“Appellant”) respectfully requests a thirty (30) day extension of time to file the Initial Brief of Appellant and the Designation of Matter in the above-captioned appeal. This is the second request for an extension filed on Appellant’s behalf.

This request is necessitated due to the filing of a Motion to Withdraw as Counsel by Appellant’s counsel of record, Matthew Tillman of Womble Bond Dickinson (US) LLP, which is still pending before this Court. Mr. Tillman seeks to withdraw on the stated ground that a conflict of interest exists between Appellant and Mr. Tillman’s law firm. Appellant has since retained the undersigned counsel. A thirty (30) day extension of time will serve the interests of justice by allowing the undersigned counsel adequate time to review the brief prepared by Mr.

Tillman and familiarize himself with the record. Appellant does not request this extension for the impermissible purpose of delay.

In conjunction with the Motion to Withdraw as Counsel, Mr. Tillman filed a Motion for Extension of Time, requesting that the deadline for filing Appellant's Initial Brief and Designation of Matter be extended until Monday, September 27, 2021. That Motion is also still pending before this Court. Should Appellant's requests be granted, the new due date for filing Appellant's Initial Brief and Designation of Matter would be October 27, 2021. Accordingly, Appellant respectfully requests that this Court enter an Order extending the deadline for the Initial Brief of Appellant and Designation of Matter until October 27, 2021. Appellant further requests that the current deadline be held in abeyance while the Court considers this request.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, SC Bar No. 101906

98 ½ Broad Street, Suite B

Charleston, SC 29401

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[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

*Attorney for the Appellant*

Charleston, South Carolina

September 24, 2021

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Appellate Case No. 2019-002002

Estate of Patricia B. Holliday.....Plaintiff,

v.

Ross S. Holliday.....Respondent.

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PROOF OF SERVICE

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I do hereby certify that on the 24th day of September 2021, I served a copy of the within *Notice of Appearance* and *Motion for Extension of Time* on all counsel of record via their AIS-designated email at the below email addresses. Pursuant to Rule 262(C)(3), SCACR, and the Order of The Supreme Court of South Carolina, RE: Methods of Electronic Filing Under Rule 262 of the South Carolina Appellate Court Rules, entered August 25, 2021, a copy of the email to counsel is attached.

Matthew E. Tillman  
Womble Bond Dickinson (US) LLP  
P. O. Box 999  
Charleston, South Carolina 29402  
matthew.tillman@wbd-us.com  
*Attorney for Appellant*

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Alice F. Paylor, Esq.  
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*Attorneys for Respondent*

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

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*Attorney for the Appellant*

**From:** Jesse Sanchez jesse@jessesanchezlaw.com   
**Subject:** The Estate of Patricia B. Holliday v. Ross S. Holliday - Appellate Case No. 2019-002002  
**Date:** September 24, 2021 at 11:42 AM  
**To:** matthew.tillman@wbd-us.com, tnettles@rosenhagood.com, apaylor@rosenhagood.com, bghom@rosenhagood.com



Dear Counsel,

For service, please find the attached Cover Letter, Notice of Appearance, and Motion for Extension of Time, which is being filed momentarily with the South Carolina Court of Appeals via OneDrive electronic submission.

Regards,

Jesse

--

Jesse Sanchez  
The Law Office of Jesse Sanchez, LLC  
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September 24, 2021

**VIA ONEDRIVE ELECTRONIC SUBMISSION**

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

**Re: The Estate of Patricia B. Holliday v. Ross S. Holliday  
Appellate Case No. 2019-002002**

Dear Ms. Kitchings,

Enclosed herewith, please find the following for filing with the Court:

1. Notice of Appearance of Jesse Sanchez on behalf of Appellant
2. Appellant's Motion for Extension of Time
3. Proof of Service

Pursuant to the Order of The Supreme Court of South Carolina, Re: Methods of Electronic Filing Under Rule 262 of the South Carolina Appellate Court Rules, entered August 25, 2021, I have deposited a law firm check for the \$50.00 filing fee in today's outgoing mail.

Thank you for your attention to this matter. Should you have any questions regarding this submission, please do not hesitate to contact me directly at (843) 814-8181.

Sincerely,

s/Jesse Sanchez  
Jesse Sanchez, SC Bar No. 101906  
*Attorney for Appellant*

Cc: All counsel of record (via email only)

**THE LAW OFFICE OF JESSE SANCHEZ, LLC**  
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Estate of Patricia B. Holliday.....Appellant,

v.

Ross S. Holliday..... Respondent.

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NOTICE OF APPEARANCE

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The undersigned, Jesse Sanchez, Esquire, of the Law Office of Jesse Sanchez, LLC,  
hereby respectfully enters his appearance on behalf of the Estate of Patricia B. Holliday  
("Appellant").

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, SC Bar No. 101906

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*Attorney for the Appellant*

Charleston, South Carolina  
September 24, 2021



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September 24, 2021

VIA ONEDRIVE ELECTRONIC SUBMISSION

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South Carolina Court of Appeals  
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Re: The Estate of Patricia B. Holliday v. Ross S. Holliday  
Appellate Case No. 2019-002002

Dear Ms. Kitchings,

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Thank you for your attention to this matter. Should you have any questions regarding this submission, please do not hesitate to contact me directly at (843) 814-8181.

Sincerely,

s/Jesse Sanchez  
Jesse Sanchez, SC Bar No. 101906  
*Attorney for Appellant*

Cc: All counsel of record (via email only)