

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
Circuit Court

The Honorable Charles B. Simmons, Jr., Common Pleas Judge

Appellate Case No. 2021-000854

Kenneth F. Brown and Renee B. Brown.....Respondents,

v.

Teresa Lynn Waldrop.....Appellant.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant, Teresa Lynn Waldrop, by and through her undersigned attorneys, respectfully moves this Court for an Order granting her ability to serve and file her initial brief outside the filing deadline set by Rule 208 of the South Carolina Appellate Court Rules, and in support of this Motion, Appellant states and respectfully shows the following:

1. Appellant received the trial transcript from the court reporter on September 28, 2021, making her filing deadline for her Initial Brief and Designation of Matters October 28, 2021.
2. Due to the fact that Appellant counsel was not trial counsel and is still in the process of obtaining and reviewing the record below, it is necessary that Appellant be provided additional time to submit her Initial Brief and Designation of Matters.
3. Appellant has received consent from opposing counsel for Respondents, Kenneth F. Brown and Renee B. Brown, for an additional thirty (30) days for the filings of Initial

Briefs and Designation of Matters.

4. For these reasons, the Appellant is requesting the time to file her Initial Brief and Designation of Matter be extended by thirty (30) days.

Respectfully Submitted,

SMITH HUDSON LAW, LLC

/s Joseph O. Smith

Joseph O. Smith (S.C. Bar No. 77475)

Joshua J. Hudson (S.C. Bar No. 100311)

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Attorneys for Appellant

October 26, 2021

Greenville, South Carolina

Other Counsel of Record:

Ronald Clement, Esq.

Attorney At Law

P.O. Box 10261

Greenville, SC 29603

Attorneys for Respondents

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Oct 26 2021

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Initial Brief on the above-named Respondents via electronic mail, on October 26, 2021, addressed to counsel of record as follows.

Ronald Clement, Esq.
Attorney At Law
P.O. Box 10261
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Attorneys for Respondents

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October 26, 2021
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SC Court of Appeals

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VIA E-MAIL

Hon. Jenny Abbott Kitchings
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: *Kenneth F. Brown and Renee B. Brown v. Teresa L. Waldrop*
Appellate Case No. 2021-000854
SHL No. 2861.0001

Dear Madam Clerk:

Enclosed please find Smith Hudson Law Check No. 2331 made payable to the SC Court of Appeals to cover the motion filing fee for Appellant's Motion for Extension of Initial Brief Deadline submitted electronically on October 26, 2021.

Thank you for your attention to this matter. If you have any question or issues, please do not hesitate to contact me.

With kind regards, I am,

Sincerely,

SMITH HUDSON LAW, LLC

Joseph O. Smith

cc: Ronald Clement, Esq.