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Nov 29 2021

SC Court of Appeals

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.

**APPELLANT’S SECOND 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 an additional 30-day extension to submit her initial brief and designation of matter to be included in the record on appeal in the above-referenced case, which are currently due on November 29, 2021. 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. Appellant filed a Motion for Extension of Time to File Initial Reply on October 26, 2021, and, on November 2, 2021, the Court issued an Order granting an extension through November 29, 2019.
2. Appellant and Respondent counsel are currently in the midst of discussing settlement of the underlying action and have dedicated their time in this matter to that effort.

Therefore, it is necessary that Appellant be provided additional time to determine whether pursuit of this appeal is necessary and 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 an additional thirty (30) days.

Respectfully Submitted,

SMITH HUDSON LAW, LLC

/s Joseph O. Smith
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Attorneys for Appellant

November 29, 2021
Greenville, South Carolina

Other Counsel of Record:

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Attorneys for Respondents

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v.

Teresa Lynn Waldrop.....Appellant.

PROOF OF SERVICE

I certify that I have served the Second Motion for Extension of Time to File Initial Brief on the above-named Respondents via electronic mail, on November 29, 2021, addressed to counsel of record as follows.

Ronald Clement, Esq.
Attorney At Law
P.O. Box 10261
Greenville, SC 29603
runjulirun@aol.com
Attorneys for Respondents

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November 29, 2021

VIA E-MAIL

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

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

Dear Madam Clerk:

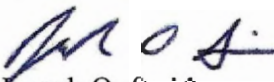
Enclosed please find Smith Hudson Law Check No. 2342 made payable to the SC Court of Appeals to cover the motion filing fee for Appellant's Second Motion for Extension of Initial Brief Deadline submitted electronically on November 29, 2021.

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.