

**IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM YORK COUNTY
TEASA KAY WEAVER**

**Appellate Case No. 2021-000816
Lower Case No. 2016-CP-46-000820**

Vicki Lynn Vergeldt, individually, and as Successor Trustee
of the John Vergeldt, Jr. Revocable Living Trust dated
September 27,1978..... Plaintiff/Respondent,

v.

John Edward Vergeldt.....Defendant/Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF RESPONDENTS
VICKI LYNN VERGELDT, INDIVIDUALLY, AND AS SUCCESSOR TRUSTEE OF THE
JOHN VERGELDT, JR. REVOCABLE LIVING TRUST DATED SEPTEMBER 27,1978
AND DESIGNATION OF MATTER**

Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27,1978 (“Respondent”), by and through her undersigned counsel respectfully requests a 30 day extension of time, or until January 14, 2022 to file the Initial Brief and Designation of Matter for Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27,1978, which is currently due on December 15, 2021. The request is based on counsel’s and his staff’s workload demands and other commitments.

Prior to filing this Motion, counsel for Respondent consulted with counsel for Appellant John Edward Vergeldt, and she consented to the requested extension.

Respectfully submitted,

Taylor A. Peace by her Attorney, with permission

Taylor A. Peace (S.C. Bar No. 100206)

Harrell, Martin & Peace, P.A.

P.O. Box 1000

Chapin, South Carolina 29036

(803) 345-3353

*Attorney for Respondent Vicki Lynn Vergeldt,
individually, and as Successor Trustee of the John
Vergeldt, Jr. Revocable Living Trust dated
September 27, 1978*

December 9, 2021
Chapin, South Carolina

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
TEASA KAY WEAVER

Appellate Case No. 2021-000816
Lower Case No. 2016-CP-46-000820

Vicki Lynn Vergeldt, individually, and as Successor Trustee
of the John Vergeldt, Jr. Revocable Living Trust dated
September 27,1978..... Plaintiff/Respondent,

v.

John Edward Vergeldt.....Defendant/Appellant.

PROOF OF SERVICE

I hereby certify that I have served a copy of the **Motion For Extension Of Time To File Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27,1978's Initial Brief and Designation Of Matter** in the above referenced case has been served on December 9, 2021, on the following by causing a copy to be delivered via the U.S. Postal Service to Counsel to the addresses shown below:

Desa Ballard, Esq.
BALLARD & WATSON
P.O. Box 6338
West Columbia, SC 29171

Taylor A. Peace by h. Mc Peay, with permission

Taylor A. Peace (S.C. Bar No. 100206)
Harrell, Martin & Peace, P.A.
P.O. Box 1000
Chapin, South Carolina 29036
(803) 345-3353
*Attorney for Respondent Vicki Lynn Vergeldt,
individually, and as Successor Trustee of the
John Vergeldt, Jr. Revocable Living Trust
dated September 27,1978*

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Dec 09 2021

SC Court of Appeals



L.K. "Trey" Harrell, III
Jeremy C. Martin
M. Alan Peace **
Taylor A. Peace
Andrea "Andi" Cornelison
Erik T. Norton

Robert W. Dibble, Jr. *
William Jennings (Bill) Buchanan *
Donald W. Tyler *
Thomas B. Jackson, III *

*Of Counsel
**Certified Mediator/Arbitrator

December 9, 2021

VIA EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: **Vicki Lynn Vergeldt, et al. v. John Vergeldt**
Appellate Case No.: 2021-000816
Case No. 2016-CP-46-000820
Our File No.: 3490.00001

Dear Ms. Kitchings:

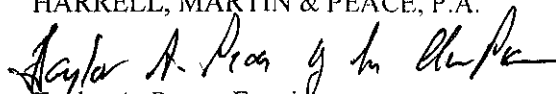
Our law firm represents the Respondent, Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27, 1978, in the above referenced matter. Enclosed please the Respondent Vicki Lynn Vergeldt, individually, and as Successor Trustee of the John Vergeldt, Jr. Revocable Living Trust dated September 27, 1978's Motion for Extension of Time of Respondent to File Initial Brief and Designation of Matter. Also enclosed is our firm's check in the amount of \$50.00 for the filing fee. Please file the originals and return a clocked copy to me in the self-addressed envelope provided.

By copy of this letter, I am serving all counsel of record with a copy of the same.

Thank you for your assistance with this matter.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.



Taylor A. Peace, Esquire

TAP/tsm

Enclosures

cc: Desa Ballard, Esq. – via email only