

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

**RECEIVED**

**JAN 24 2022**

APPEAL FROM CHARLESTON COUNTY  
Circuit Court

**S.C. SUPREME COURT**

Kristi Lea Harrington, Circuit Court Judge

Opinion No. 5859  
SC Court of Appeals Case No. 2021-001491  
Appellate Case No.: 2018-000562.

Mary P. Smith, Mazell Mitchell Jefferson, individually  
And as Personal Representative of the Estate of Annabelle  
Thornton, Shirrese B. Brockington, as Special Administrator  
of the Estate of Janine Gourdine, Emma Smalls, Viola Pringle,  
Cephus Thornton, Arthur Graddick, III, an imprisoned person,  
Venetra Watson, and any known or unknown persons or entities  
claiming any interest in the Estates of Lucinda Pringle, Odessa  
Graddick, Arthur Graddick, Jr., Annabelle Thornton and  
Janine Gourdine,

.....Appellants,

v.

Angus M. Lawton, Personal Representative of the Estate of  
Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr.  
and unknown PR Rebecca Patricia Brown,

.....Respondents.

**RESPONDENTS' MOTION FOR EXTENSION OF  
TIME TO FILE REPLY TO  
APPELLANTS' PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rule SCRPC 263 (b), Respondents' Angus M. Lawton, Personal Representative of the Estate of Lucinda Pringle, Evelina Brown Moses, Thomas P. Brown, Jr., and unknown PR Rebecca Patricia Brown (hereinafter "Respondents") hereby respectfully move for an extension of twenty (20) days to file their Reply to Appellants' Petition for Writ of Certiorari. Appellants' counsel, T. Jeff Goodwyn, Jr., Esq., has been apprised of this request and has no objections as is evidenced by the attached email in Exhibit A to this Motion for Extension of Time. Respondents' Reply to Appellants' Petition for Rehearing shall now be due on or before Monday, February 7, 2022.

January 21, 2022



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*PR of the Estate of Lucinda Pringle*

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*Attorney for Appellants/  
Special Administrator*

**Rachel Savini**

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**From:** jgoodwyn goodwynlaw.com <jgoodwyn@goodwynlaw.com>  
**Sent:** Friday, January 21, 2022 12:28 PM  
**To:** Rachel Savini  
**Subject:** RE: Mary P. Smith, et al. v. Angus M. Lawton, et al.

No, that's fine.

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**From:** Rachel Savini [mailto:rsavini@derfneraltman.com]  
**Sent:** Friday, January 21, 2022 12:09 PM  
**To:** jgoodwyn goodwynlaw.com <jgoodwyn@goodwynlaw.com>  
**Subject:** Mary P. Smith, et al. v. Angus M. Lawton, et al.

Good afternoon, Mr. Goodwyn.

In preparing our Motion for Extension and Proof of Service, I realized that Jon miscalculated the date (extending the deadline for our return 20 days instead of 15).

Do you have any objection to a 20-day extension, making our return due 02/07/2022?

Thank you,  
Rachel R. Savini, Paralegal  
Paralegal to Jonathan S. Altman, Esq. and Armand G. Derfner, Esq.