

# TURNER LAW, LLC

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**Mar 09 2022**

**SC Court of Appeals**

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March 9, 2022

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

Re: Pleasant Spring AME Church et al v. Pleasant Spring Church et al.  
**Appellate Case No: 2022-000009**

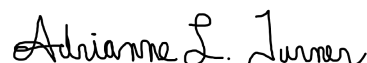
Dear Ms. Kitchings:

Please find enclosed Appellants' first Motion to Extend Time for Filing Appellants' Initial Brief and Designation of Matter to Be Included in the Record on Appeal, together with check number 1056 in the amount of Fifty (\$50.00) to cover the cost of filing this motion.

By copy of this letter and the attached Motion sent via electronic mail, I am advising Kenneth Davis and Tierney Goodwyn, both of Boykin & Davis, LLC, of this correspondence.

With kind regards, I am

Sincerely,



Adrienne L. Turner

cc: Kenneth Davis  
Tierney Goodwyn

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In The South Carolina Court of Appeals  
On Appeal From the Lexington County Court of Common Pleas  
Appellate Case No: 2022-000009

**Mar 09 2022**  
SC Court of Appeals

**Pleasant Spring AME Church et al**

**Respondents,**

**v.**

**Appellate Case No: 2022-000009**

**Pleasant Spring Church et al,  
Appellants**

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

1. Counsel for Appellant recently advised the Court that the Transcripts in this matter were ordered and received prior to the filing of this appeal; however, Counsel's office inadvertently failed to properly calendar relevant deadlines for perfecting the appeal based on having previously ordered and received the transcripts. Due to this inadvertence, the time for filing the Appellant's initial brief has passed without having been properly calendared within Counsel's office.
2. In addition, Counsel for the Appellant has experienced a heavy work load over the past several weeks, to include preparations for a multi-day jury trial, which, particularly in light of Counsel's status as a solo practitioner, has involved a far greater time commitment than originally anticipated and has interrupted Counsel's ability to complete the initial brief.
3. Counsel for Appellants therefore requests an extension of time to file the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal until April 8, 2022.
4. This is Appellant's first motion for an extension of time with respect to filing the Appellant's Initial Brief, although the initial inadvertence concerning the status of transcripts resulted in a miscalculation of the initial due date.
5. This motion is not being made for purposes of delay; rather, Counsel's initial inadvertent calendaring error and heavy workload have necessitated this request.
6. Counsel for Appellant further requests that all deadlines relevant to perfecting the appeal in this matter be held in abeyance pending the Court's ruling on this motion.

Accordingly, Appellant requests an extension of time until April, 8 2022 to file and serve the Appellant's Initial Brief.

*/s/ Adrienne L. Turner*

Adrienne L. Turner

Bar # 6840

Counsel for Appellant

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Mar 09 2022

SC Court of Appeals

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Motion to Extend Time for Filing Appellant's Initial Brief  
And Designation of Matter to be Included in the Record on Appeal was sent via electronic mail to:

Kenneth Davis, Esquire  
kdavis@boykinlawsc.com  
And  
Tierney Goodwin, Esquire  
tgoodwyn@boykinlawsc

/s/ *Adrienne L. Turner*

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Adrienne L. Turner