

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

**RECEIVED**  
**Jun 13 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 LEAVE TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL OUT OF TIME.**

1. Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal was due to be filed on May 20, 2022.
2. Due to an interoffice miscommunication between Counsel and Counsel's newly hired temporary assistant, filings Counsel believed to be readied for mailing were not forwarded to the court for filing within the time period prescribed by the Court.
3. Counsel was away from the office for a time and did not become aware of the error until notified by the Court that the documents had not been properly submitted for filing.
4. Copies of Appellants Initial Brief and Designation of Matter are being forwarded together with this motion, which, in addition to being electronically filed, is being forwarded to the Court via UPS mail service along with the required filing fee.
5. Counsel for Appellant therefore requests leave of court to requests leave from this Court to file Appellants Initial Brief and Designation of Matter outside the time previously set for submission.
6. This motion is not being made for purposes of delay; rather, the circumstances set forth above have necessitated this request.
7. Counsel for Appellants 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 leave to file Appellant's Initial Brief and Designation of Matter upon the Court's receipt and processing of this motion and the included documents.

/s/ Adrienne L. Turner

Adrienne L. Turner

Bar # 6840

Counsel for Appellant

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**CERTIFICATE OF SERVICE**

**I certify that a true and correct copy of the Motion For Leave to File Appellant's Initial Brief And Designation of Matter to be Included in the Record on Appeal Out Of Time was sent via electronic mail to the following counsel of record on June 13, 2022:**

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

/s/ *Adrienne L. Turner*

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Adrienne L. Turner

# TURNER LAW, LLC

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June 13, 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' Motion For Leave to File Appellants' Initial Brief and Designation of Matter to Be Included in the Record on Appeal Out Of Time, together with Check number 1057 in the amount of fifty (\$50.00) dollars 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

