

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Aug 11 2023

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2023-000281
Case No. 2022-CP-23-04350

LVNV Funding LLC, Respondent,

v.

Jennifer Lorick

Appellant.

**RESPONSE TO RESPONDENT'S MOTION TO DISMISS
AND REQUEST TO ALLOW LATE FILING OF APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant responds to the Respondent's Motion to Dismiss as follows:

Pursuant To Rule 240 SCACR, this Court allowed additional time until July 31, 2023 for the filing of the Initial Brief and Designation of Matter in this case. Those documents, along with Proof of Service, were mailed 4 days after the deadline on August 4, 2023 to the Court and Counsel for Respondent. They were received by the court and presumably by counsel for the Respondent and posted on August 9, 2023, the same day the Respondent's Motion to Dismiss was filed. The late filing was not intended for the purposes of delay and was not an intentional violation of the deadline. The Respondent suffered no prejudice from the 4-day delay in filing. For these reasons, the Appellant respectfully requests that this Court exercise its discretion and allow the late filing of the Initial Brief of Appellant and Designation of Matter.

SOUTH CAROLINA LEGAL SERVICES

/s/Susan Ingles
Susan Ingles, Esq. SC Bar #004577
Attorney for Appellant

August 11, 2023

701 South Main Street
Greenville, SC 29601
864-679-3244
susaningles@sclegal.org

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON AUGUST 11, 2023, I SERVED A COPY OF THIS RESPONSE ON THE ATTORNEY FOR THE RESPONDENT AT THE FOLLOWING ADDRESS:

Michael Brittain Travis
Attorney for Respondent
1744 Sam Rittenberg Drive, Suite D
Charleston, SC 29407

And via facsimile: 843-806-3193

/s/ Susan Ingles
Attorney for the Appellant

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August 11, 2023

Honorable Jenny Abbott Kitchings
P.O. Box 11629
Columbia, S.C. 29211

And via facsimile 803-734-1839

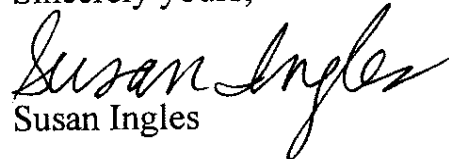
RE: LVNV Funding, LLC v. Jennifer L. Lorick
Appellate Case No. 2023-000281

Dear Madame Clerk:

Enclosed for filing in your office are the following:

1. Response to Motion to Dismiss of Respondent
2. Proof of Service

Sincerely yours,


Susan Ingles

Encl.

C: Michael Brittain Travis

