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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

RECEIVED  
JUL 12 2013  
SC COURT OF APPEALS

Appellate Case No. 2013-000448  
Case No.: 2010-CP-28-322

Jamie Curley, ..... Respondent,

v.

SCENT Land Holdings, LLC, Amy Puchalski,  
and Robert Puchalski, ..... Appellants.

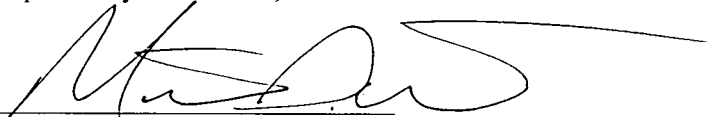
MOTION FOR LEAVE TO FILE OUT OF TIME

Pursuant to Rule 240, SCACR, Appellants SCENT Land Holdings, LLC, Amy Puchalski, and Robert Puchalski hereby move this Honorable Court requesting leave to file its Return to Respondent's Motion to Dismiss out of time.

Respondent's counsel filed a Motion to Dismiss on June 27, 2013 which was received by my office on July 1, 2013. Appellants' counsel was on a previously scheduled vacation during the week of July 1, 2013 and did not review Respondent's Motion to Dismiss until the date the Return to Respondent's Motion was due on July 8, 2013. The proposed Appellants' Return to Respondent's Motion will aid the Court in resolution of this matter and will not prejudice any party.

Therefore, Appellants respectfully request this Honorable Court to grant leave for Appellants to file a Return to Respondent's Motion to Dismiss out of time and allow Appellants' counsel ten (10) days from the date of this Court's Order to file said Return.

Respectfully submitted,

A handwritten signature in black ink, appearing to be a cursive combination of the names Vincent A. Sheheen and Michael D. Wright, written over a horizontal line.

Vincent A. Sheheen (S.C. Bar No. 115552)  
Michael D. Wright (S.C. Bar No. 78401)  
Savage, Royall & Sheheen, LLP  
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Post Office Drawer 10  
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July 10, 2013

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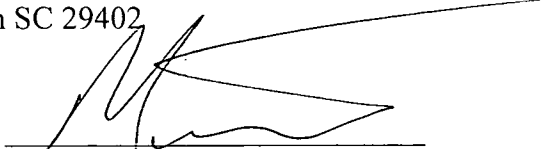
v.

SCENT Land Holdings, LLC, Amy Puchalski,  
and Robert Puchalski, ..... Appellants.

PROOF OF SERVICE

I certify that I have served the Request to File Motion Out of Time dated on July 10, 2013, by depositing a copy of it in the United States Mail, postage prepaid, on July 10, 2013, addressed to the attorneys of record as follows:

Morris Ellison, Esquire  
Jana B. Baker, Esquire  
Womble Carlyle Sandridge & Rice, PLLC  
PO Box 999  
Charleston SC 29402



Vincent A. Sheheen (S.C. Bar No. 115552)  
Michael D. Wright (S.C. Bar No. 78401)  
Savage, Royall & Sheheen, LLP  
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July 10, 2013

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July 10, 2013

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

RE: Jamie Curley v. SCENT Land Holdings, LLC, et. al.  
Appellate Case No. 2013-000448

Dear Mrs. Kitchings:

I hope this correspondence finds you doing well.

Enclosed please find Appellants' Motion for Leave to File Out of Time in the above-referenced matter. Additionally, please find the enclosed Twenty-Five Dollar and No Cents (\$25.00) filing fee to accompany this Motion.

By copy of this letter, I am serving all counsel of record with the enclosed documents. If you have any questions, please do not hesitate to contact me.

Very truly,



Michael D. Wright

cc: Morrison Ellison, Esquire  
Jana B. Baker, Esquire

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