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Feb 26 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2023-001147

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes III, Master in  
Equity and Special Circuit Court Judge  
Case No. 2020-CP-07- 00977

BOKF Real Estate Holding, LLC

Respondent,

v.

T &S Management, Inc. and  
Turan Strange

Appellants.

PROOF OF SERVICE

On this 26<sup>th</sup> day of February, 2024, the undersigned did serve Appellants' Motion to File Out of Time, Initial Brief, and Designation of Matter for Record on appeal on counsel for the Respondent, by email and by placing same in the United States mail to the address below. The Initial Brief was previously served by email on February 12, 2024:

Edward Kubec Esq.  
Novit & Scarminach  
52 New Orleans Road  
Hilton Head Island, SC  
29928

February 26, 2024

Respectfully Submitted,

Mogil Law Firm

/s Michael W. Mogil

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February 26, 2024

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: BOKF Real Estate Holding, LLC v T & S Management, Inc. and Turan Strange  
Appellate Case No. 2023-001147

Dear Mrs. Kitchings and Mrs Harrison:

Responsive to the Court's instruction dated February 14, attached/enclosed please find Appellant's Motion to File out of Time, Designation of Matter for Record on Appeal, and Proof of Service.

I interpret Rule 267 (b) as permitting attorneys to sign pleadings with electronic signature, as we do in Common Pleas court. If I interpret this incorrectly and ink signatures are required please let me know I can correct and refile quickly.

Very Truly Yours,

/s/ Michael W. Mogil;

Michael W. Mogil

cc: Ed Kubec, Esq.

