

Motion to File Out of Time

IN THE COURT OF APPEALS
STATE OF SOUTH CAROLINA

George Jenkins, Appellant

v.

Florence Heyward Davis, Respondent

Case No. 2019-CP-10-06647

Appellant Case No. 2024-001929

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AUG 28 2025

SC Court of Appeals

MOTION TO FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER OUT OF TIME

Florence Heyward Davis, Respondent, appearing pro se, respectfully moves this Court for leave to serve and file her Respondent's Initial Brief and Designation of Matter out of time pursuant to Rules 208, 209, and 240, SCACR.

In support of this Motion, Respondent states as follows:

1. Respondent was previously represented by counsel, but has elected to proceed **pro se** and has filed a Motion to Relieve Counsel and Notice of Pro Se Representation.
2. Due to the transition from representation by prior counsel to proceeding pro se, additional time was needed to prepare and finalize the Respondent's Initial Brief. Respondent prepared the filing in good faith and did not intend to cause delay.
3. The requested filing is now complete and is being tendered simultaneously with this Motion.
4. No prejudice will result to Appellant by allowing Respondent's brief and designation to be filed out of time, and the interests of justice favor resolving this matter on the merits.

WHEREFORE, Respondent respectfully requests that this Court grant her Motion and accept the Respondent's Initial Brief and Designation of Matter for filing out of time.

Respectfully submitted,

Dated: ___ August 26 ___, 2025

Florence Heyward Davis, Pro Se
Florence Heyward Davis, Pro Se

14 Ridge Square NW Suite 300

C/O DCUL OFFICE 308

Washington, DC 20016

843-364-6578

floellern@gmail.com

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing Motion to File Out of Time upon the Appellant, George Jenkins, by depositing a copy in the United States Mail, postage prepaid, addressed as follows:

George Jenkins

1348 South Sherwood Drive

Charleston, SC 29407

Dated: __August 26__, 2025

Florence Heyward Davis, Pro Se

Florence Heyward Davis

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AUG 28 2025

SC Court of Appeals

COVER LETTER TO CLERK OF COURT

Florence Heyward Davis
14 Ridge Square NW Suite 300
% DCUL Office 308
Washington, DC 20016

843-364-6578

floelleRN@gmail.com

Date: August 25, 2025

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street

Columbia, SC 29201

Email: ctappfilings@sccourts.org

Re: *George Jenkins v. Florence Heyward Davis*
Case No. 2019-CP-10-06647

Appellate Case No. 2024-0001929

Respondent's Filings (Initial Brief, Motion, Designation of Matter)

Dear Clerk:

Please find enclosed for filing in the above-referenced case the following documents on behalf of the Respondent, Florence Heyward Davis, who is now appearing **pro se**:

- 1. Respondent's Initial Brief**
- 2. Motion to File Respondent's Initial Brief and Designation of Matter Out of Time**
(with Certificate of Service)
- 3. Respondent's Designation of Matter** (with Certificate of Service)

These filings are submitted pursuant to the Court's letter dated August 14, 2025, and in accordance with Rules 208, 209, and 240, SCACR.

Please file these materials accordingly. Copies have been served upon Appellant George Jenkins via U.S. Mail as reflected in the attached Certificates of Service.

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AUG 28 2025

SC Court of Appeals

Thank you for your attention and assistance.

Respectfully submitted,

Florence Heyward Davis, Pro Se

Florence Heyward Davis, Pro Se

**IN THE COURT OF APPEALS
STATE OF SOUTH CAROLINA**

George Jenkins, Appellant,

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FLORENCE HEYWARD-DAVIS
C/O DCUL OFFICE 308
14 RIDGE SQUARE NW
STE 300
WASHINGTON, DC 20016
UNITED STATES US

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TO CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
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COLUMBIA SC 29201

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SC Court of Appeals