

In this 13th year of the 2nd millennium, ~13th day of the 9th Lunar Cycle(November) aka 11/13/2013.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

CASE NO.: 2012-CP-23-6148/6149
Appellate Case No.: 2013-001488

SUNTRUST BANK,

Respondent,

Vs.

BILAL ABDULLAH AND LATOYA ABDULLAH.

Appellate(s)

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NOV 18 2013
SC Court of Appeals

VERIFIED MOTION TO ALLOW LATE FILING

We, *Bilal and LaToya Abdullah* moves this Court to enter an Order to allow the late filing of the Verified Response to Respondent's Memorandum in Opposition to Appellant's Petition for Rehearing; and HEREBY states:

1. We were under the impression, according to SCACR Rule 240(e); it was within that time frame.
2. According to your notice there was a possible overlook at the time frame allowed indicating to another South Carolina Appellate Court Rule that is not specified.

WHEREFORE; we move the court to enter an order to allow my late filing where there was a mix up on which rule was applicable on the time frame allowed.

Notice to Agent is Notice to Principal. Notice to Principal is Notice to Agent.

CERTIFICATE OF SERVICE

UNDER PENALTY OF PERJURY within the law of the UNITED STATES CODES, I HEREBY CERTIFY that a true and correct copy will be furnished by U.S. mail delivery to: **Jenny Abbott Kitchings, Clerk of Court**, P.O. Box 11629, Columbia, South Carolina 29211; **South Carolina Supreme Court Clerk**, Post Office Box 11330, Columbia, South, Carolina 29211; **Sheila M. Bias- Richardson Plowden & Robinson, P.A.**, P.O Drawer 7788, Columbia, SC 29202.

In this 13th year of the 2nd millennium, ~13th day of the 9th Lunar Cycle(November) aka 11/13/2013.

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: SUNTRUST BANK
VS: BILAL ABDULLAH AND LATOYA ABDULLAH
CASE NO.: 2012-CP-23-6148/6149
APPELLATE CASE NO. 2013-001488

Dear Jenny Abbott Kitchings,

Enclosed is our **Motion to Allow Late Filing**.

Thank you for your assistance in this regard. If there are any questions or comments please call.

Contact
Cell – 407-595-3868
Home – 864-283-0842

I Am: *Bilal Abdullah*

Bilal Nashid Abdullah, Authorized Representative:
In Special Appearance under Threat, Duress and Coercion
Non-Assumpsit – All Rights Reserved, Without Prejudice:
c/o 7 Landing Lane
Simpsonville Non-Domestic near (29681)-9999
South Carolina United States of America

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SUNTRUST BANK.

Respondent,

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Appellate(s)

PROOF OF SERVICE

I certify that I have served the Motion to Allow Late Filing on SUNTRUST BANK by depositing a copy of it in the United States Mail, postage prepaid, on November 13, 2013, addressed to their attorney of record, Sheila M. Bias, Post Office Drawer 7788, Columbia, South Carolina 29202. South Carolina Court of Appeals Clerk of Court, Jenny Abbott Kitchings, P.O. box 11629, Columbia, South Carolina 29211.

I am *Bilal Abdullah*
Al-Bilal Nashid Abdullah, Authorized Representative
Non-Assumpsit – All Rights Reserved, Without Prejudice:
c/o 7 Landing Lane
Simpsonville non-domestic near (29681)-9999
South Carolina united States of America

I am *Latoya Abdullah*
Latoya Abdullah, Authorized Representative
Non-Assumpsit – All Rights Reserved, Without Prejudice:
c/o 7 Landing Lane
Simpsonville non-domestic near (29681)-9999
South Carolina united States of America

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Formerly submitted,

I Am: Bilal Abdullah

Bilal Abdullah, Ex Relatione BILAL ABDULLAH
Non-Assumpsit – All Rights Reserved, Without Prejudice:
c/o 7 Landing Lane
Simpsonville non-domestic near (29681)-9999
South Carolina united States of America

I Am: LaToya Abdullah

LaToya Abdullah, Ex Relatione LATOYA ABDULLAH
Non-Assumpsit – All Rights Reserved, Without Prejudice:
c/o 7 Landing Lane
Simpsonville non-domestic near (29681)-9999
South Carolina united States of America

IN THE NAME OF THE ALMIGHTY!!!

NOTARY PUBLIC

In the State of **South Carolina**, County of **Greenville**

BEFORE ME personally appeared Al-Bilal Nashid Abdullah and LaToya Abdullah, affirmed and subscribed in my presence this 13 day of November, 2013.

[Signature]
Notary Public

Personally Known _____ OR Produced Identification / - Type Produced: SCL

