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SC Court of Appeals

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. 2013-CP-23-5177

Beverley D. Wilson,

Appellant,

v.

Stephen P. Williams,

Respondent.

NOTICE OF MOTION TO REINSTATE APPEALS

Beverley D. Wilson motions for reinstatement of the appeals of the orders of the Honorable D. Garrison Hill dated November 18, 2013. Appellant received written notice of entry of these orders on November 26, 2013 and originally filed her Notice of Appeal on December 18, 2013. The Court of Appeals granted Appellant the right to appeal, however, due to extreme, extenuating circumstances, the Appellant was not able to timely file and serve the initial brief and designation of matter as required by Rules 208 and 209 of the South Carolina Appellate Court Rules. Appellant respectfully submits this Notice of Motion to Reinstate Appeals and includes Memorandum in support of her Motion to Reinstate Appeals.

This 5 Day of March, 2014

s/ Beverley D. Wilson
Beverley D. Wilson
Post Office Box 2865
Orangeburg, South Carolina
29116
(803) 682-0697
Pro Se Appellant

Other Counsel of Record:
Michael D. Glenn
Glenn, Haigler, and Stathakis, LLP
121 West Benson Street
Anderson, South Carolina 29624
Attorney for Respondent

(864) 226-1885
(864) 224-9677

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right. The signature is positioned above a vertical line that runs down the center of the page.

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NOTICE OF MOTION TO REINSTATE APPEALS

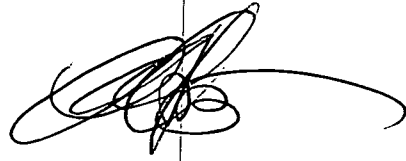
Beverley D. Wilson motions for reinstatement of the appeals of the orders of the Honorable D. Garrison Hill dated November 18, 2013. Appellant received written notice of entry of these orders on November 26, 2013 and originally filed her Notice of Appeal on December 18, 2013. The Court of Appeals granted Appellant the right to appeal, however, due to extreme, extenuating circumstances, the Appellant was not able to timely file and serve the initial brief and designation of matter as required by Rules 208 and 209 of the South Carolina Appellate Court Rules. Appellant was robbed at gunpoint while leaving her office December 17, 2013. Due to extreme emotional trauma associated with this event and an inability to acquire adequate police surveillance security to ensure a safe working environment, it was necessary for the Appellant to close her medical practice in Orangeburg, South Carolina and reestablish her medical practice in a new locality sufficiently far removed from Orangeburg, South Carolina to ensure her emotional and physical safety. This process has been arduous and emotionally draining and has prevented Appellant sufficient opportunity to access the records associated with this case to timely file the requisite initial brief and designation of matter as required by Rules 208 and 209 of the South Carolina Appellate Court Rules. Appellant begs the Court's pardon and respectfully submits this Memorandum in support of her Motion to Reinstate Appeals.

This 5 Day of March, 2014

s/ Beverley D. Wilson
Beverley D. Wilson
Post Office Box 2865
Orangeburg, South Carolina 29116
(803) 682-0697
Pro Se Appellant

Other Counsel of Record:
Michael D. Glenn
Glenn, Haigler, and Stathakis, LLP

121 West Benson Street
Anderson, South Carolina 29624
Attorney for Respondent
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Case No. 2013-CP-23-5177

Beverley D. Wilson Appellant,

v.

Stephen P. Williams.....Respondent

PROOF OF SERVICE

Beverley D. Wilson
Post Office Box 2865
Orangeburg, South Carolina 29116
(803) 682-0697
(803) 536-6008 (fax)
Pro Se Appellant

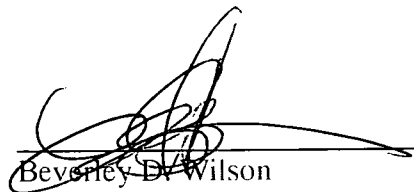
Michael D. Glenn, Esquire
GLENN, HAIGLER &
STATHAKIS, LLP
121 West Benson Street
Anderson, South Carolina 29624
Attorney for the Respondent
(864) 226-1885 (office)
(864) 224-9677 (office)
(864) 226-0561 (fax)

I hereby certify that copies of the following items:

- 1) NOTICE OF MOTION TO REINSTATE APPEALS and
- 2) Memorandum in Support of NOTICE OF MOTION TO REINSTATE APPEALS to the South Carolina Court of Appeals.

in the above action have been served upon opposing counsel by facsimile and U.S. Mail by certified, return receipt today as noted above.

This 5 Day of March, 2014


Beverley D. Wilson

March 4, 2014

Beverley D. Wilson
Post Office Box 2865
Orangeburg, South Carolina 29116
(803) 682-0697
(803) 536-6008 (fax)
Email: wilsonfam63@yahoo.com

South Carolina Court of Appeals
Clerk of Court
Jenny Abbott Kitchings
1205 Pendleton Street
Columbia, SC 29201
(803) 734-1890

Re: Notice of Motion to Reinstate Appeals and Memorandum in Support of Notice of Motion to Reinstate Appeals
Beverley D. Wilson vs. Stephen P. Williams
Case Number: 2013-CP-23-5177

Dear Ms. Kitchings:

I enclose herewith the Notice of Motion to Reinstate Appeals and Memorandum in Support of Notice of Motion to Reinstate Appeals for the above referenced case along with three (3) copies of each of these documents. Please time stamp all documents, filing one set of documents with the South Carolina Court of Appeals and returning three (3) time stamped copies of the aforementioned documents to me, of which one (1) copy will be distributed to Michael D. Glenn, Esquire and Glenn, Haigler & Stathakis LLP.

Sincerely,


Beverley D. Wilson

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SC Court of Appeals

March 4, 2014

Beverley D. Wilson
Post Office Box 2865
Orangeburg, South Carolina 29116
(803) 682-0697
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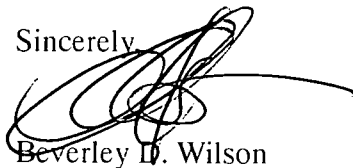
Michael D. Glenn
GLENN, HAIGLER & STATHAKIS, LLP
Attorneys at Law
121 West Benson Street
Anderson, South Carolina 29624
(864) 226-1885 (office)
(864) 224-9677 (office)
(864) 226-0561 (fax)

Re: Notice of Motion to Reinstate Appeals and Memorandum in Support of Motion to Reinstate Appeals to STATE OF SOUTH CAROLINA COURT OF APPEALS
Beverley D. Wilson vs. Stephen P. Williams
Case Number: 2013-CP-23-5177

Dear Mr. Glenn:

I enclose herewith a copy of the Notice of Motion to Reinstate Appeals and Memorandum in Support of Motion to Reinstate Appeals of the above referenced case to the South Carolina Court of Appeals along with Proof of Service by U.S. Mail and facsimile. I will forward the time clocked copies from the respective Clerks of Court upon my receipt.

Sincerely,



Beverley D. Wilson

Enclosure: Proof of Service

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