

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.

4/28/14  
*[Signature]*  
Memorandum in Support

NOTICE OF MOTION TO REINSTATE APPEALS

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SC Court of 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  
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