

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

17 3070

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2012-205726

The Estate of Gordon Bridwell by Raymond Eddie Bridwell, Personal Representative,
.....Respondent

v.

Life and Hope Assembly of God, Mary Ellen Harris, and John Doe, Representing unknown
persons claiming to Life and Hope Assembly of God.....Appellants.

PETITION TO REINSTATE APPEAL

The undersigned attorney, on behalf of the Appellants, petitions this Court to reinstate Appellant's appeal for good cause shown pursuant to the South Carolina Rules of Appellate Procedure, Rule 231(a).

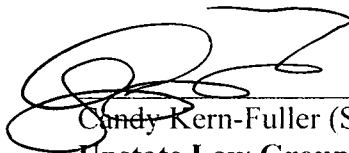
As grounds for the reinstatement Appellant contends that she received the Court's letter of June 17, 2014, and prepared and sent the proof of service via facsimile and U.S. Mail on June

RECEIVED
AUG 01 2014
SC Court of Appeals

27, 2014 as shown by the attached confirmed facsimile and proof of service. (**See Exhibits A and B, attached hereto**).

The undersigned's daughter was in a head on collision in Charleston on July 13, 2014 and was hospitalized at MUSC from July 13, 2014 through July 21, 2014 and was notified of the Court's Order of July 17, 2014 on July 22, 2014. On that date, the undersigned contacted the Deputy Clerk and was advised to email the Proof of Service and the facsimile confirmations. Since the undersigned was dealing with her daughter's medical issues, the undersigned's assistant emailed Ms. Allen later that day with the attachments. (**See attached Exhibit C**).

Accordingly, the undersigned, on behalf of Appellant, respectfully requests that this Court reinstate Appellant's appeal for good cause shown.



Candy Kern-Fuller (SC Bar No. 11392)
Upstate Law Group, LLC
200 East Main Street
Easley, South Carolina 29640
(864) 855-3114
(864) 855-3446 (Facsimile)
Candy@UpstateLawGroup.com

August 1, 2014

Attorney for Appellant

EXHIBIT A

TRANSMISSION VERIFICATION REPORT

TIME : 06/27/2014 17:59
NAME : UPSTATELAWGROUPLLC
FAX : 8648553446
TEL : 8648553114
SER. # : G8J712974

DATE, TIME	06/27 17:58
FAX NO./NAME	18037341839
DURATION	00:00:51
PAGE(S)	05
RESULT	OK
MODE	STANDARD
	ECM

EXHIBIT B



UPSTATE LAW GROUP, LLC

Candy M. Kern-Fuller, Esq.
Managing Partner
Howard E. Sutter, III, Esq.
Partner
Nicole L. Thornton, Esq.
Associate

200 EAST MAIN STREET
EASLEY, SOUTH CAROLINA 29640

www.UPSTATELAWGROUP.com
864.855.3114 (ph) • 864.855.3446 (fax)

June 27, 2014

VIA FACSIMILE AND U.S. MAIL

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

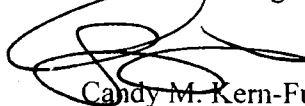
Re: Estate of Bridwell v. Life and Hope Assembly
Case Number: 2012-205726

Dear Ms. Kitchens:

Pursuant to Ms. Allen's letter of June 17, 2014, please find attached the Proofs of Service and Motion, as requested therein, in addition to the required motion filing fee.

Thank you for your time and consideration of this matter.

With kindest regards,



Candy M. Kern-Fuller, Esq.

Encl.

Cc: George E. LaFaye, IV, Esq.
Rev. Mary Ellen Harris

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ANDERSON COUNTY

Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2012-205726

The Estate of Gordon Bridwell by Raymond Eddie Bridwell, Personal Representative,
.....Respondent

v.

Life and Hope Assembly of God, Mary Ellen Harris, and John Doe, Representing
unknown persons claiming to Life and Hope Assembly of God.....Appellants.

PROOF OF SERVICE

I certify that on this date, I have served an original and six (6) copies of the Motion to Accept the Record on Appeal Out of Time and the proof of service upon the Plaintiff/Respondent for the Motion and Record on Appeal to:

The Honorable Jenny Abbott Kitchings
1015 Sumter Street
Columbia, South Carolina 29201



Candy Kern-Fuller, Esq. (SC Bar No. 11392)

UPSTATE LAW GROUP, LLC

200 E. Main Street

Easley, SC 29640

(864) 855-3114

(864) 855-3446 (facsimile)

June 27, 2014

ATTORNEYS FOR APPELLANT

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ANDERSON COUNTY

Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2012-205726

The Estate of Gordon Bridwell by Raymond Eddie Bridwell, Personal Representative,
.....Respondent

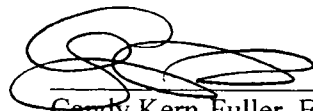
v.

Life and Hope Assembly of God, Mary Ellen Harris, and John Doe, Representing
unknown persons claiming to Life and Hope Assembly of God.....Appellants.

PROOF OF SERVICE ON RESPONDENT

I certify that on this date, I have filed served three copies of the Record on Appeal and one copy of the Appellant's Motion to Accept the Record on Appeal Out of Time upon the Plaintiff/Respondent via U.S. Mail addressed to:

George E. LaFaye, IV
201 Whitsett Street
Greenville, SC 29601



Candy Kern-Fuller, Esq. (SC Bar No. 11392)

UPSTATE LAW GROUP, LLC

200 E. Main Street

Easley, SC 29640

(864) 855-3114

(864) 855-3446 (facsimile)

ATTORNEYS FOR APPELLANT

June 27, 2014

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM ANDERSON COUNTY

Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2012-205726

The Estate of Gordon Bridwell by Raymond Eddie Bridwell, Personal Representative,
.....Respondent

v.

Life and Hope Assembly of God, Mary Ellen Harris, and John Doe, Representing unknown
persons claiming to Life and Hope Assembly of God.....Appellants.


PETITION TO ACCEPT RECORD ON APPEAL OUT OF TIME

The undersigned attorney, on behalf of the Appellants, petitions this Court to accept the
Record on Appeal out of time.

As grounds for this motion, Appellant contends that prior to the Record on Appeal being
due, Mary Ellen Harris filed a *pro se* request that the Court allow her to file her own individual
reply brief to address concerns that she had regarding representations made to the Court. Both
Appellant and Respondent concurred that if the Court allowed her to make such a filing that the

Record on Appeal may need to be reprinted and bound and thus agreed to wait to file the Record until Rev. Harris' motion was resolved.

Accordingly, the undersigned, on behalf of Appellant, respectfully requests that this Court accept the Record on Appeal out of time.



Candy Kern-Fuller (SC Bar No. 11392)
Upstate Law Group, LLC
200 East Main Street
Easley, South Carolina 29640
(864) 855-3114
(864) 855-3446 (Facsimile)
Candy@UpstateLawGroup.com

June 27, 2014

Attorney for Appellant

EXHIBIT C

Candy Kern-Fuller

From: Susan Lockwood <susan@upstatelawgroup.com>
Sent: Tuesday, July 22, 2014 5:04 PM
To: callen@sccourt.org
Cc: gelivlaw@gmail.com; candy@upstatelawgroup.com
Subject: Conversation with Candy
Attachments: Proofs of Service and Motion.pdf; Letter from Court of Appeals.pdf; Court of Appeals Order.pdf

Ms. Allen,

Pursuant to your conversation with Ms. Kern-Fuller today, I am sending you the documents that she requested I send to you. Please advise if there is anything more that you require.

Thank you,
Susan

Susan Greene Lockwood
Legal Assistant
Upstate Law Group
200 East Main Street
Easley, S.C. 29640
(864) 855-3114



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMTER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

June 17, 2014

Ms. Candy M. Kern-Fuller, Esquire
200 E Main St
Easley SC 29640-2073

Re: The Estate of G. Bridwell v. Life
Appellate Case No. 2012-205726

Dear Counsel:

The Court has not received proof of service for the record on appeal. Therefore, you are requested to serve the record on appeal and file the original-proof of service within ten (10) days of the date of this letter. The proof of service must be accompanied by a motion requesting that the Court accept service of the record on appeal out of time. Failure to provide the proof of service and the motion within ten days will result in the dismissal of this appeal.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Mary Ellen Harris
George Eugene Lafaye, IV, Esquire

The South Carolina Court of Appeals

The Estate of Gordon W. Bridwell, Jr. by Raymond
Eddie Bridwell, Personal Representative, Respondent,

v.

Life and Hope Assembly of God, Mary Ellen Harris, and
John Doe, Representing, unknown persons claiming to
Life and Hope Assembly of God, Appellants.

Appellate Case No. 2012-205726

The Honorable Robin B. Stilwell
Greenville County
Trial Court Case No. 2010CP2302382

ORDER

Appellant has failed to provide proof of service of the record on appeal, as required by Rule 210 of the South Carolina Appellate Court Rules, and as requested in the Court's letter of June 17, 2014. Accordingly, this matter is dismissed. The remittitur will be sent as provided by Rule 221(b), SCACR.

FOR THE COURT

BY V. Claire Allen, Deputy
CLERK

Columbia, South Carolina

FILED
July 17, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2012-205726

The Estate of Gordon Bridwell by Raymond Eddie Bridwell, Personal Representative,
.....Respondent

v.

Life and Hope Assembly of God, Mary Ellen Harris, and John Doe, Representing unknown
persons claiming to Life and Hope Assembly of GodAppellants.

APPELLANT'S PROOF OF SERVICE

I certify that, pursuant to SCRAP 208, I have filed an original and six additional copies of the Appellant's Petition to Reinstate Appeal with the Clerk of the South Carolina Court of Appeals along, by hand delivery on August 1, 2014 to:

The Honorable Jenny Abbot Kitchens
South Carolina Court Of Appeals
PO Box 11629
Columbia SC 29211

with a copy to opposing counsel by depositing, with the United States Post Office with sufficient postage appended, a copy in an envelope on August 1, 2014 addressed to:

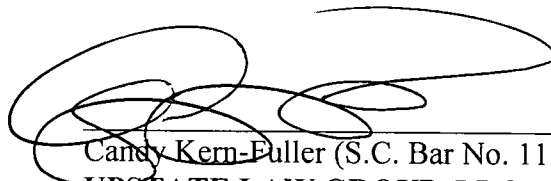
George E. LaFaye, IV, Esq.
201 Whitsett Street
Greenville, S.C. 29601

[Signature block on next page]

RECEIVED

AUG 01 2014

SC Court of Appeals



Candy Kern-Fuller (S.C. Bar No. 11392)

UPSTATE LAW GROUP, LLC

200 East Main Street

Easley, South Carolina 29640

(864) 855-3114 (Ph)

(864) 855-3446 (Fax)

Candy@UpstateLawGroup.com

August 1, 2014

ATTORNEY FOR APPELLANT