

75156

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
In The Court of Common Pleas

The Honorable R. Markely Dennis

Case No. 2013-CP-08-0149

RECEIVED

FEB 24 2015

SC Court of Appeals

St. Stephen Family Dentistry, LLC,.....Respondent

v.

Linda Gregg and Douglas Allen Kaufman. Appellants

**MOTION FOR LEAVE TO FILE RECORD ON APPEAL
OUT OF TIME**

The Appellants hereby move for leave to serve and file its Record on Appeal out of time and in support thereof states as follows:

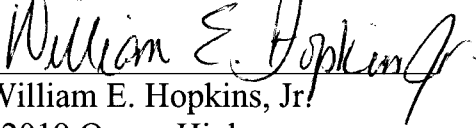
1. This appeal was filed on March 27, 2014.
2. Appellants filed their Initial Brief and Designation of Matters on August 29, 2014.

Respondent filed its Initial Brief and Designation of Matters on November 14, 2014.

3. Under Rule 210(a), SCACR, Appellants were to serve the Record on Appeal on February 23, 2015. A special two-week term of court has been set in the Lee County Court of Common Pleas for a two-week jury trial in the case of Berry v. Lee County Landfill, SC, LLC. Counsel for Appellants represents the Plaintiffs W.A. and Ruth Berry. This case is to be tried the weeks of February 23rd and March 2, 2015 before Judge Ferrell Cothran. Therefore, the Record on Appeal will not be served to accommodate this deadline.

4. Counsel for Appellants respectfully requests Leave to Serve the Record on Appeal out of time and have such time as until March 11, 2015 in which to file their Record on Appeal.

Respectfully Submitted,


William E. Hopkins, Jr.
12019 Ocean Highway
Post Office Box 1885
Pawleys Island, South Carolina 29585
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F: (843) 314-9365
bill@hopkinsfirm.com

ATTORNEY FOR APPELLANTS

February 23, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis

Case No.: 2013-CP-08-0149

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v.

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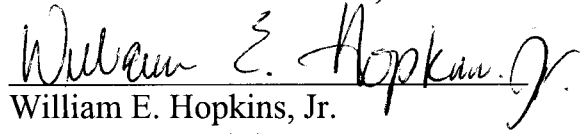
PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing **Motion to File Record on Appeal Out of Time** has been served upon counsel of record by depositing a copy of the same, postage prepaid, on this 23rd day of February, 2015, to the addresses shown below.

George J. Kefalos, Esquire
Oana D. Johnson, Esquire
46 A State Street
Charleston, South Carolina 29401

Jack D. Cordray, Esquire
Cordray Law Firm
40 Calhoun Street, Suite 420
Charleston, South Carolina 29413

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February 23, 2015

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SC Court of Appeals

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 292101

RE: St. Stephen Family Dentistry, L.L.C. v. Linda Gregg and Douglas Allen
Kaufman
Appellate Case No.: 2013-002798

Dear Ms. Kitchings:

Enclosed for filing is a Motion for Leave to File Record on Appeal Out of Time, along with a Proof of Service, in the above-referenced case. We have also enclosed our Firm's check in the amount of \$25.00 for the filing fee. Please file the Motion and return the file stamped extra copy to me in the enclosed self-addressed, stamped envelope.

Sincerely,



William E. Hopkins, Jr.

WEHjr/rds

Enclosures

cc: George J. Kefalos, Esquire
Jack Cordray, Esquire
Linda Gregg
Douglas A. Kaufman

From: (843) 314-4202
D'Shea S. Yuskum
12019 Ocean Highway
Pawleys Island, SC 29585

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The Honorable Jenny Abbott Kitching
South Carolina Court of Appeals
1015 Sumter Street

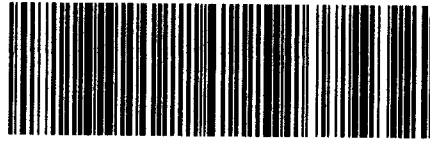
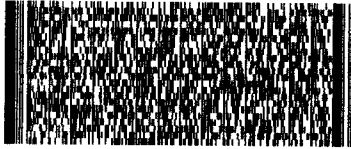
COLUMBIA, SC 29201

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FEB 24 2015
SC Court of Appeals

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