

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM JASPER COUNTY

Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

RECEIVED

OCT 13 2015

S.C. SUPREME COURT

Opinion No. 2015-UP-384

Appellate Case No. 2015-001847

Robert C. Schivera, Executor of the Estate of Fed J. Hughes, III.....Respondent

Vs.

C. Russell Keep, III, Esquire and Rhonda Mitchell, Jasper County Tax Collector,
Defendants,

Of Whom C. Russell Keep, III, Esquire is thePetitioner.

MOTION TO FILE OUT OF TIME

I received the Return on Monday, September 21, 2015 by mail and I mailed out the Reply on the following Tuesday, September 29, 2015.

The Proof of Service states that the Return was mailed on September 15, 2015, 6 days later I received it from Mr. Rivers, whose office is about 35 miles away. There is simply no way to reply in 5 days time.



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PH: (843) 842-6268
Fax: (843) 78-8458
Attorney for Petitioner

October 8, 2015

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PROOF OF SERVICE

I certify that I have served a copy of the Motion to File Out of Time, upon the Respondent, Robert C. Schivera and Rhonda Mitchell by depositing a copy in the United States Mail, postage prepaid, on October 8, 2015, and addressed to their Attorney of Record, Thayer Rivers, Esq., Post Office Box 668, Ridgeland, SC 29936 and David Tedder, Jasper County Attorney, Post Office Box 1282, Beaufort, SC 29901.

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