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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 25 2016

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Honorable Larry H. Hyman, Jr., Circuit Court Judge (Recused)
Honorable Steven H. John, Circuit Court Judge (Final Order)

Appellate Case No.: 2015-001621

Retha Pierce Sturdivant Appellant

vs.

City Of Conway Respondent

MOTION TO ALLOW LATE FILING OF REPLY TO RESPONDENT'S RETURN

Retha Pierce (Sturdivant)
412 32nd Avenue South
Atlantic Beach, South Carolina 29582-4716
Phone: (843) 503-8752
Pro Se Appellant

MOTION TO ALLOW LATE FILING OF REPLY TO RESPONDENT'S RETURN

The Appellant, Retha Pierce Sturdivant, received on March 19, 2016 a letter dated March 17, 2016 which alludes to an alleged deficiency as noted under the South Carolina Appellate Court Rules (SCACR) and must be corrected within ten days: "The document has not been timely filed ..." The Appellant now tenders the **MOTION TO ALLOW LATE FILING OF REPLY TO RESPONDENT'S RETURN** due to the subsequent facts:

1. The Appellant was of the opinion that she had at least ten (10) days to reply to the **RESPONDENT'S REPLY TO MOTION OF APPELLANT** for Appellate Case No.: 2015-001621 from the date of her initial receipt of it.

2. The Appellant first received notice of the **REPLY TO MOTION OF APPELLANT** by the Respondent, O. Terry Beverly, upon returning to Atlantic Beach, after a two-week absence required to take care of some other urgent family matters, when she picked up all mail-on-hold at the North Myrtle Beach Post Office in North Myrtle Beach, South Carolina on Monday, February 22, 2016.

3. Appellant could not return to the Atlantic Beach address any earlier than the family member delivered her since she is unable to operate a vehicle due to the wrongful loss of her driving license because of the wrongful First Offense Driving Under Influence (DUI) Conviction which ricocheted in a wrongful Driving Under Suspension (DUS) Conviction.

4. Appellant is nearly a seventy-year-old female continually overwhelmed, as well as stagnated, by the inconceivables, wrongful convictions, and penalties that have immersed her for nearly a decade due to criminal/judicial neo-cheating for political and personal agendas.

5. Appellant's need for a licensed driver 24/7, as a result of wrongful convictions, have compounded complexities and given additional impediments.

1220 Senate Street, Suite 200
Columbia, South Carolina 29201

North Myrtle Beach, South Carolina
March 23, 2016

Respectfully submitted by:

By: *Retha Pierce Sturdivant* 03/23/2016

Retha Pierce Sturdivant
412 32nd Avenue South
Atlantic Beach, South Carolina 29582-4716
(843) 503-8752
Pro Se Appellant

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PROOF OF SERVICE

I, Retha Pierce Sturdivant, Appellant, certify that I have served the MOTION TO ALLOW LATE FILING OF REPLY TO RESPONDENT'S RETURN. A copy of it was deposited with the United States Post Office, postage pre-paid, on the 23rd day of March 2016 to each of the following:

O. Terry Beverly, Esquire
Attorney At Law
1202 Third Avenue
Conway, South Carolina 29526-5106

Honorable Claire V. Allen, Deputy Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

South Carolina Court Administration

In conclusion for all of the above reasons and others, the Appellant reiterates the **MOTION**
TO ALLOW LATE FILING OF REPLY TO RESPONDENT'S RETURN.



North Myrtle Beach, South Carolina
March 22, 2016

Respectfully submitted,
By: Retha Pierce Sturdivant 03/22/2016
Retha Pierce Sturdivant
412 32nd Avenue South
Atlantic Beach, South Carolina 29582-4716
Phone: (843) 503-8752
Pro Se Appellant

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412 32nd Avenue South
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Honorable V. Claire Allen, Deputy Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appellate Case No.: 2015-001621 --- Motion to Allow Late Filing of Reply to Respondent's Return; Proof of Service; and Money Order for \$25.00 Filing Fee

Dear Deputy Clerk Allen:

In response to your letter dated March 17, 2016, which I received on Saturday, March 19, 2016, please find my endeavor to rectify the alleged deficiency that you noted under the South Carolina Appellate Court Rules (SCACR) relative to my "... reply to respondent's return to the motion ...". Please find enclosed the Motion to Allow Late Filing of Reply to Respondent's Return, Proof of Service, and a money order for \$25.00 filing fee.

Thank you for your attention in this matter.

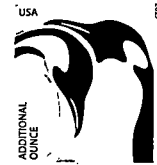
Sincerely,

Retha Pierce Sturdivant 03/22/2016

Retha Pierce (Sturdivant)
Pro Se Appellant

Cc: O. Terry Beverly, Esquire; South Carolina Court Administration

Reba Price (Guardiant)
412 3rd Avenue South
Atlantic Beach, SC 29582-4716



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SC Court of Appeals

Honorable V. Claire Allen, Deputy Clerk
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