

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SEP 12 2016
SC Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

CIVIL ACTION NO.2013-CP-27-00577
Appellate Tracking No.: 2016-000041

Mary Wiggins, as Personal Representative of Kelvin Marquise Wiggins,.....Appellant,

v.

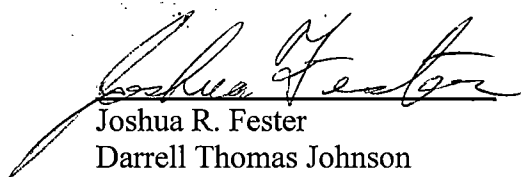
Enterprise Leasing Company-SouthEast, LLC.....Respondents.

**MOTION FOR PERMISSION TO SERVE
RECORD ON APPEAL**

Appellant, by and through her undersigned attorney, Joshua R. Fester, Esquire, hereby moves pursuant to Rule 240(a) of the South Carolina Appellate Court Rules, for permission for filing the Record On Appeal after the date it was due which was August 15, 2016. Appellant represents to this Court that Appellate's Reply Brief was served on Friday, July 15, 2016 making the deadline for filing of the Record on Appeal, Monday, August 15, 2016. Appellant forwarded a motion on September 7, 2016 requesting an extension until September 30, 2016.

This Motion is made upon grounds that Counsel for the Appellant needed this additional time to prepare the Record on Appeal. Counsel for Appellant would further represent to the Court that all other briefs have been filed without benefit of an extension of time and that the granting of this extension would not unduly delay consideration of this appeal.

September 9, 2016

A handwritten signature in cursive script, appearing to read "Joshua R. Fester", is written over a horizontal line.

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Other Counsel of Record:

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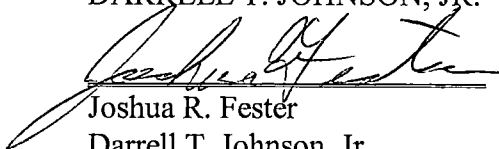
v.

Enterprise Leasing Company-SouthEast, LLC.....Respondents.

PROOF OF SERVICE

I certify that I have served the Motion for Permission to Serve Record on Appeal on Enterprise Leasing Company-SouthEast, LLC by depositing a copy of it in the United States Mail, postage prepaid, on September 9, 2016, addressed to the attorney of record, Robert E. Kneece, III, Esquire, Turner Padgett Graham & Laney, P.A., Post Office Box 22129, Charleston, South Carolina 29413.

LAW OFFICE OF
DARRELL T. JOHNSON, JR.



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September 7, 2016

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** Also Licensed in Georgia

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SC Court of Appeals

Ms. Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

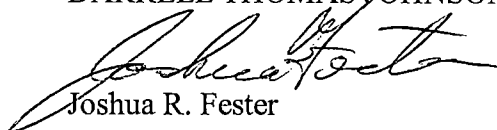
RE: Mary Wiggins as Personal Representative of Kelvin Marquise Wiggins v
Enterprise Leasing Company-SouthEast, LLC
Appellate Case No.: 2016-000041

Dear Ms. Kitchings:

Enclosed for filing is the Motion for Permission to Serve Record on Appeal, along with Proof of Service. I have also enclosed a check from this office in the amount of \$25.00 for the cost of filing.

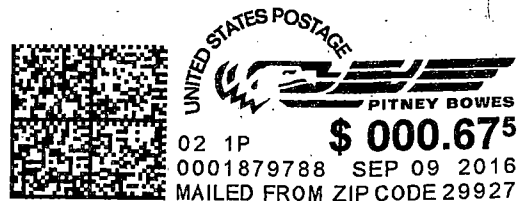
Thanking you in advance, I am

Sincerely,
LAW OFFICE OF
DARRELL THOMAS JOHNSON, JR.


Joshua R. Fester

JRF/tc
Enclosures

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