

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2014-CP-16-0792

RECEIVED
OCT 25 2016
SC Court of Appeals

State Farm Mutual Automobile
Insurance Company, Respondent,

v.

Beverly Goyeneche, David R. Gray, III,
and Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray),
individually and as Parent and Natural Guardian of S.G., Defendants,

of whom

Beverly Goyeneche and Amanda
Goyeneche are Appellants.

**MOTION FOR THE COURT TO ACCEPT THE
APPELLANTS' INITIAL BRIEF OUT OF TIME**

Pursuant to Rules 240 and 263(b), SCACR, Appellants hereby move this Court to accept for filing out of time the initial brief of appellants and designation of matter to be included in the record on appeal. The initial brief of appellants and designation of matter was due to be filed on October 24, 2016.

The initial brief of appellants and designation of matter to be included in the record on appeal are conditionally filed with this motion and served on all other parties.

October 25, 2016

Respectfully submitted,



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Attorneys for Appellants

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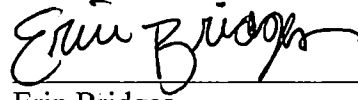
Beverly Goyeneche and Amanda
Goyeneche are Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel with a copy of the *Motion for the Court to Accept the Initial Brief of Appellants
and Designation of Matter to be Included in the Record on Appeal Out of Time* and the
conditionally filed *Initial Brief of Appellants and Designation of Matter to be Included in
the Record on Appeal* by mailing copies of the same by United States Mail with first class
postage prepaid to the following address:

Jonathan M. Robinson
DuBose-Robinson, PC

PO Drawer 39
Camden, SC 29021-0039

A handwritten signature in black ink that reads "Erin Bridges". The signature is written in a cursive style with a horizontal line extending to the right across the signature.

Erin Bridges

October 25, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

RECEIVED

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SC Court of Appeals

October 25, 2016

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: State Farm v. Goyeneche et. al.
Case Tracking No.: 2016-000840

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a Motion for the Court to Accept the Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal Out of Time. Also, please find enclosed the conditionally filed original and one (1) copy of the Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal. I have also enclosed a proof of service upon counsel for the Respondent and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Karl H. Smith, Esquire
Jonathan M. Robinson, Esquire