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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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NOV 14 2016
SC Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Special Referee

Martin S. Driggers, Jr., Special Referee for Darlington County

Case No.: 2012-CP-16-1021

Vanderbilt Mortgage and Finance, Inc..... Respondent,

v.

Ashton C. Bull, Linda Bull, Park Avenue Homes, South Carolina Department of Motor
Vehicles..... Appellants.

MOTION TO FILE OUT OF TIME

NOW COIME the Appellants, by and through the undersigned, pursuant to Rule 240 of the Appellate Court Rules and respectfully request leave to file the Record on Appeal in this matter out of time. As grounds therefore, Appellate states as follows:

1. The Record on Appeal in this matter was initially due on or about October 12, 2016.
2. The South Carolina Supreme Court issued Administrative Order 2016-10-10-01 declaring October 5 to October 14, 2016 statewide "holidays" for the purposes of computation of time. This means the Record on Appeal in this matter would have been due closer to the end of October.
3. Appellant's counsel sustained significant damage to his law office as a result of Hurricane Matthew and his office was closed for a period of time until


flooring and walls were replaced.

4. The Record on Appeal was filed with the Court on November 7, 2016 and the Appellants seek leave that they be allowed to file out of time.

WHEREFORE, for the foregoing reasons, the Appellants respectfully request that they be allowed to file the Record on Appeal out of time.

THE WOODSON LAW FIRM, L.L.C.

By:



Marcus Woodson
Post Office Box 1657
Marion, SC 29571
(843)423-1977 telephone
Attorney for the Appellant

November 11, 2016

Other Counsel of Record:

Theodore von Keller
Crawford & von Keller, L.L.C.
Post Office Box 4216
Columbia, SC 29240

Demitri K. Koutrakos
Louis H. Lang
Callison, Tighe & Robinson, L.L.C.
Post Office Box 1390
Columbia, SC 29202-1390

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v.

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Vehicles.....Appellants.

PROOF OF SERVICE

I certify that I have served the Motion to File Out of Time on Vanderbilt Mortgage
and Finance, Inc. by depositing a copy of it in the United States Mail, postage prepaid,
on November 12, 2016, addressed to their attorney of record, Theodore von Keller, Post
Office Box 4216, Columbia, South Carolina 29240.

November 12, 2016



Marcus Woodson
The Woodson Law Firm, L.L.C.
1011 E. Liberty Street
Post Office Box 1657
Marion, South Carolina 29571
(843)423-1977 telephone
Attorney for Appellants

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Vehicles..... Appellants.

PROOF OF SERVICE

I certify that I have served the Motion to File Out of Time on Vanderbilt Mortgage and Finance, Inc. by depositing a copy of it in the United States Mail, postage prepaid, on November 12, 2016, addressed to their attorneys of record, Demetri K. Koutrakos and Louis H. Lang, Post Office Box 1390, Columbia, South Carolina 29202-1390.

November 12, 2016



Marcus Woodson
The Woodson Law Firm, L.L.C.
1011 E. Liberty Street
Post Office Box 1657
Marion, South Carolina 29571
(843)423-1977 telephone
Attorney for Appellants



THE WOODSON LAW FIRM, L.L.C.

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Marion, SC 29571
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Facsimile: (843) 423-9608

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November 12, 2016

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

Re: Case Name: Vanderbilt Mortgage and Finance, Inc. vs. Ashton C. Bull,
Linda Bull, Park Avenue Homes and South Carolina
Department of Motor Vehicles
Case No.: 2012-CP-16-1021 (Darlington County)
2015-002194 (Appellate)

Dear Ms. Kitchings:

I have enclosed the following:

1. A Motion to File out of Time and six duplicate originals,
2. Proof of Service upon Theodore von Keller,
3. Proof of Service upon Demetri K. Koutrakos and Louis Lang, and
4. A check for \$25.00 to cover the motion fee.

Please contact me if you have any questions or concerns.

Very truly yours,

Marcus Woodson

Enclosures (9)

PRESS FIRMLY TO SEAL



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The Woodson Law Firm
PO Box 1657
Marion, SC 29571

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TO: (PLEASE PRINT)

PHONE 803 734 1890

Jenny Abbott Kitchings
Clerk of Court SC Court of Appeals
PO Box 11629
Columbia SC
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29501	11-14-16	\$ 22.95					
Date Accepted (MM/DD/YY)	Scheduled Delivery Time	Insurance Fee	COD Fee				
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