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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Case No. 2015-002361

**RECEIVED**  
FEB 13 2017  
SC Court of Appeals

Ida Lord.....Plaintiff/Appellant.

v.

D & J Enterprises, Inc. ....Defendant/Respondent.

**RESPONDENT'S MOTION TO FILE OUTSIDE OF TIME**

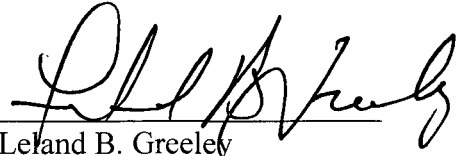
COMES NOW THE RESPONDENT, D & L Enterprises, Inc., by and through its undersigned counsel of record, and does hereby move for an Order allowing it to file outside of the time for the filing of the Final Brief.

Counsel for the Respondent submits that he has had a busy court and trial schedule during the month of January. Further, the filing of the Record on Appeal was filed outside of time, as consented to by the undersigned, and the calculation of days was missed by the undersigned.

It is submitted that the Appellant will not be prejudiced for allowing the filing outside of time and that it will further the ends of justice.

WHEREFORE the Respondent respectfully requests this motion be granted.

Respectfully submitted,



Leland B. Greeley  
128 East Main Street, Suite 102  
Post Office Box 2981  
Rock Hill, South Carolina 29732  
(803) 329-0088 S.C. Bar # 7850  
Attorney for Respondent D & J  
Enterprises, Inc.

February 9, 2017

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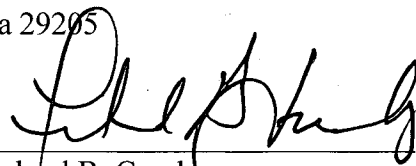
v.

D & J Enterprises, Inc. ....Defendant/Respondent.

CERTIFICATE OF SERVICE

I certify that I have served today a copy of Respondent's Motion to File Outside of Time on Appellant's attorney by depositing the same in the U.S. Mail with sufficient postage attached thereto and address as follows:

Authur K. Aiken, Esq.  
AIKEN & HIGHTOWER, P.A.  
2231 Devine Street, Suite 201  
Columbia, South Carolina 29205



Leland B. Greeley  
128 East Main Street, Suite 102  
Post Office Box 2981  
Rock Hill, South Carolina 29732  
(803) 329-0088 S.C. Bar # 7850  
Attorney for Respondent D & J  
Enterprises, Inc.

February 9, 2017

**LELAND B. GREELEY, P.A.**  
**ATTORNEY**

128 EAST MAIN STREET, SUITE 102  
ROCK HILL, SOUTH CAROLINA

Post Office Box 2981  
Rock Hill, SC 29732

(803)329-0088  
FAX: (803)329-4310

E Mail: LGreeley@lbgreeleylaw.com

February 9, 2017

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

RE: Ida Lord v. D & J Enterprises, Inc., d/b/a Cash on the Spot

Dear Ms. Kitchings:

Please find enclosed the original, along with 7 copies, of Respondent's Motion to File Outside of Time, the necessary filing fee of \$25.00 for such motion, as well as a Certificate of Service indicating service on opposing counsel.

With kindest regards, I remain

Very truly yours,



Leland B. Greeley

/adt  
Enclosures

cc: Authur K. Aiken

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**SC Court of Appeals**