

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2013-CP-23-06522

**RECEIVED**

MAY 01 2017

**SC Court of Appeals**

Madel C. Rivero, as Personal Representative  
for the Estate of Lilia Lorena Blandin, ..... Respondent,

v.

Sheriff Steve Loftis, in his capacity as  
Sheriff of Greenville County ..... Appellant.

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

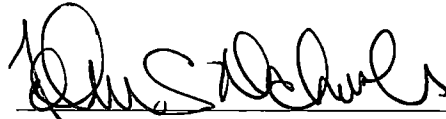
Pursuant to Rules 240 and 263(b), SCACR, Respondent hereby moves this Court to accept for filing out of time the initial brief of respondent and designation of matter to be included in the record on appeal. The initial brief of respondent and designation of matter was due to be filed on April 28, 2017.

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

/Signature page attached

May 1, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John S. Nichols", written over a horizontal line.

John S. Nichols, # 4210

Bluestein, Nichols,

Thompson & Delgado, LLC

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondent

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**PROOF OF SERVICE**

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

Russell W. Harter, Jr.  
Chapman, Harter & Harter, P.A.  
PO Box 10224  
Greenville, SC 29603

Andrew F. Lindemann  
Davidson & Lindemann, PA  
PO Box 8568  
Columbia, SC 29202-8568

  
Erin Bridges

May 1, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

May 1, 2017

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**

MAY 01 2017

**SC Court of Appeals**

Re: Madel Rivero v. Sheriff Steve Loftis  
Case Tracking No. 2016-000548

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 Respondent 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 Respondent and Designation of Matter to be Included in the Record on Appeal. I have also enclosed a proof of service upon counsel for the Appellant 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: Daniel W. Luginbill, Esquire

J. Christopher Wilson, Esquire  
Russell W. Harter, Jr., Esquire  
Carly H. Davis, Esquire  
Andrew F. Lindemann, Esquire