

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2015-CP-40-05106

RECEIVED

MAY 04 2017

SC Court of Appeals

Pearline Williams ..... Respondent,

v.

Larita Hipp and Michelle Masaryk ..... Defendants,

of whom Michelle Masaryk is the ..... 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 yesterday, on May 3, 2017.

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

/Signature page attached

May 4, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Blake A. Hewitt", written over a horizontal line.

Blake A. Hewitt, # 73674

John S. Nichols, # 4210

Bluestein, Nichols,

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Attorneys 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 to be Included in the Record on Appeal Out of Time* and the conditionally filed *Initial Brief of Respondent 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:

William H. Bowman, III  
Robert P. Wood  
Rogers Townsend & Thomas, PC  
PO Box 100200  
Columbia, SC 29202-3200

  
Erin Bridges

May 4, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

May 4, 2017

**VIA HAND DELIVERY**

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

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MAY 04 2017

SC Court of Appeals

Re: Pearlina Williams v. Larita Hipp  
Case Tracking No.: 2016-002043

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  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Gerald E. Reardon, Esquire  
William H. Bowman, III, Esquire  
Robert P. Wood, Esquire