

THE STATE OF SOUTH CAROLINA

In the Supreme Court

PETITION FOR WRIT OF CERTIORARI

Appellate Case No. 2017-000743

Betty Fisher, Petitioner v. Bessie Huckabee, Respondent

AND

Lisa Fisher, Petitioner v. Bessie Huckabee, Respondent

RESPONDENT'S MOTION TO ALLOW LATE FILING

Peter A. Kouten, Esquire
PO Box 340
Johns Island, SC 29457
(843) 789-9614; fax (843) 559-3162
pkouten@gmail.com
Attorney for Respondent Bessie Huckabee as
Personal Representative for the Estate of Alice Shaw Baker

RECEIVED

MAY 11 2017

S.C. SUPREME COURT

COMES NOW Bessie Huckabee, Respondent in the above matter, in accordance with Rule 234 of the Appellate Court Rules, moves for allowance to file Return late.

Respondent received a notice that the Supreme Court had accepted Writ on a separate matter relating to the same Petitioner. Respondent additionally received Petition for Writ in this matter. Respondent Filed Initial Brief for the other matter under this file number and then, inadvertently mis-calendared the Return due date for the Petition for Writ at bar.

Respondent filed on April 29, 2017 her Return and served her Return on the Petitioner. Respondent has been informed that the Return due date was April 17, 2019. Respondent respectfully requests that the Return be accepted out of time.

WHEREFORE, Respondent respectfully seeks an Order granting Respondent's Motion to Allow Lat Filing of Respondent's Return to Petitioner's Petition for Writ of Certiorari.

Respectfully Submitted,



Peter A. Kouten, Esquire
PO Box 340
Johns Island, SC 29457
pkouten@gmail.com
843-789-9614

May 6, 2017

THE STATE OF SOUTH CAROLINA

In the Supreme Court

RECEIVED

MAY 11 2017

PETITION FOR WRIT OF CERTIORARI

S.C. SUPREME COURT

Appellate Case No. 2017-000743

Betty Fisher, Petitioner v. Bessie Huckabee, Respondent

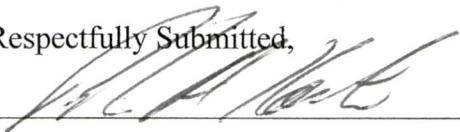
AND

Lisa Fisher, Petitioner v. Bessie Huckabee, Respondent

PROOF OF SERVICE

I certify that I have served the foregoing Respondent Motion to Allow Late Filing upon counsel for Petitioner by depositing a copy of same in the United States Mail, postage prepaid, on May 6th, 2017, addressed as noted below.

Respectfully Submitted,



Peter A. Kouten, Esquire
PO Box 340
Johns Island, SC 29457
pkouten@gmail.com
843-789-9614

Counsel Served:
John Hughes Cooper, Esquire
1476 Ben Sawyer Blvd., Ste. 11
Mt. Pleasant, SC 29464