

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUL 11 2017

SC Court of Appeals

APPEAL FROM DILLON COUNTY  
Court of Common Pleas

The Honorable Roger E. Henderson, Circuit Court Judge

Case No.: 2013-CP-17-00335

Tammy Taylor,.....Appellant,

v.

April Springs, Angela Berry, A B Country Kitchen a/k/a A & B Country Kitchen, Respondents.

**MOTION TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OUT OF TIME**

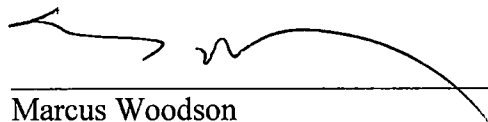
**NOW COMES** the Appellant, by and through the undersigned, pursuant to Rule 240 of the Appellate Court Rules and respectfully requests leave to file and serve the Initial Brief and Designation in this matter out of time. As grounds therefore, the Appellant states as follows:

1. The Appellant received the transcript on or about May 23, 2017,
2. The Initial Brief and Designation were due on or about June 23, 2017,
3. The Initial Brief and Designation were served on the Respondent on July 7, 2017,
4. The Initial Brief and Designation were submitted to the Court of Appeals on or about July 7, 2017.

**WHEREFORE**, for the foregoing reasons, Appellant respectfully requests that she be allowed to file and serve the Initial Brief and Designation out of time.

**THE WOODSON LAW FIRM, L.L.C.**

By:



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Marcus Woodson  
Post Office Box 1657  
Marion, SC 29571  
(843)423-1977 telephone  
ATTORNEY FOR THE APPELLANT

July 7, 2017

Other Counsel of Record  
Alan L. Berry, Jr.  
Law Offices of LeGette & Berry  
Post Office Box 305  
Latta, SC 29565-0305

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Court of Common Pleas

Roger E. Henderson, Circuit Court Judge

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Case No. 2013-CP-17-00335

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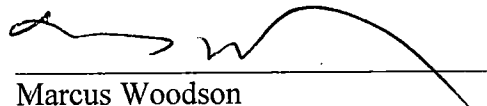
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**PROOF OF SERVICE**

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I certify that I served the Appellant's Initial Brief , Designation and Motion to File Out if Time on the Respondent's attorney, Alan L. Berry, Jr., by depositing a copy of it in the United States Mail, postage prepaid, on July 7, 2017, addressed to him at Post Office.Box 305, Latta, South Carolina 29565-0305.

July 7, 2017

  
\_\_\_\_\_  
Marcus Woodson  
Post Office Box 1657  
Marion, SC 29571  
(843)423-1977 telephone  
For the Appellant.

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JUL 11 2017

**SC Court of Appeals**



**THE WOODSON LAW FIRM, LLC.**

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Post Office Box 1657 (mailing)  
Marion, SC 29571  
Telephone: (843) 423-1977  
Facsimile: (843) 423-9608

July 7, 2017

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

Re: Case Name: Tammy Taylor vs. April Springs, Angela Berry, A B Country  
Kitchen a/k/a A. & B Country Kitchen  
Case No: 2013-CP-17-00335  
Appellate Case No.: 2017-000679

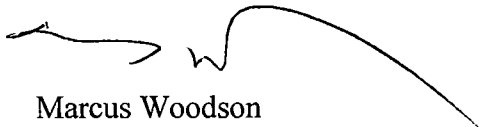
Ms. Kitchings:

I have enclosed the following:

1. Appellant's Initial Brief,
2. Designation of Matters to be Included in the Record on Appeal,
3. Proof of Service,
4. Motion to File Out of Time,
5. A Check for \$25.00 to cover the Motion filing fee.

Please contact me if you need anything else.

Very truly yours,

  
Marcus Woodson

Enclosures

Cc: Alan L. Berry, Jr.

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SC Court of Appeals

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TO **SOUTH CAROLINA COURT OF APPEALS**  
**JENNY ABBOTT KITCHINGS**  
**1220 SENATE STREET**

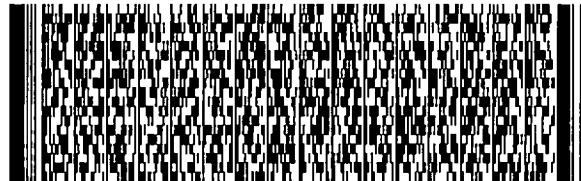
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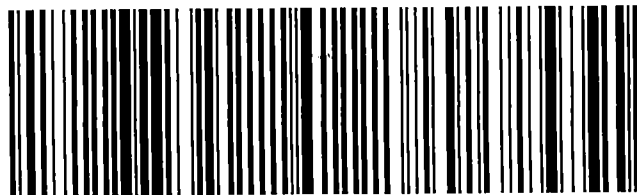
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