

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2016-001842
Case No. 2013-CP-10-3901

Charleston Electrical Services, Inc. and Selective Insurance
Company of South Carolina as Subrogee of
Charleston Electrical Services, Inc.,

Appellants,

RECEIVED

v.

JUL 12 2017

SC Court of Appeals

Wanda G. Rahall.....

Respondent.

**MOTION TO ACCEPT
FILING OUT OF TIME**

The Appellants respectfully move this Court to accept the Initial Reply Brief and Appellants' Designation of Matter to be Included in the Record on Appeal for filing out of time.

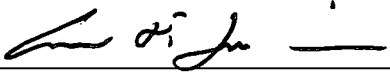
The Appellants' motion is based on the following grounds:

1. The Appellants' Initial Reply Brief and Appellants' Designation of Matter to be Included in the Record on Appeal were due to be filed by July 10, 2017.

2. The undersigned counsel for the Appellants was unable to complete the preparation of the Initial Reply Brief and Appellants' Designation of Matter to be Included in the Record on Appeal by that date because of out of town obligations and hearings that he had on July 10th and 11th as well as due to his work on another Initial Brief due in this Court on this same date.

WHEREFORE, the Appellants respectfully request that the Court accept the filing of their Initial Reply Brief and Appellants' Designation of Matter to be Included in the Record on Appeal out of time.

DAVIDSON & LINDEMANN, P.A.

BY: 

ANDREW F. LINDEMANN
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Columbia, South Carolina 29202
(803) 806-8222

Counsel for Appellants

July 12, 2017

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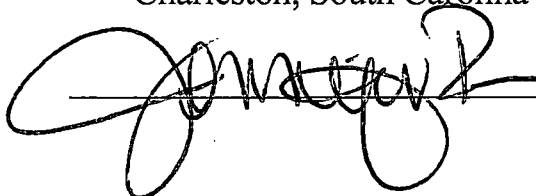
Wanda G. Rahall.....

Respondent.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Appellants, does hereby certify that service of the **Motion to Accept Filing Out of Time, Initial Reply Brief of Appellants and Appellants' Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 12th day of July 2017:

Edward K. Pritchard, III, Esquire
Elizabeth F. Fulton, Esquire
Pritchard Law Group, LLC
Post Office Box 630
Charleston, South Carolina 29402



DAVIDSON & LINDEMANN, P.A.

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July 12, 2017

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Hand Delivered

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

RE: Charleston Electrical Services, Inc. and Selective Insurance Company of South Carolina
as Subrogee of Charleston Electrical Services, Inc. v. Wanda G. Rayhall
Appellate Case Number: 2016-001842
Civil Action Number: 2013-CP-10-3901
Claim Number: 21010307
Our File Number: 307.9065

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SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion to Accept Filing Out of Time**, as well as the originals and one copy each of the **Initial Reply Brief of Appellants and Appellants' Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me by way of my courier. I have also enclosed my firm's \$25.00 check for the filing fee.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
July 12, 2017
Page Two

cc: Edward K. Pritchard, III, Esquire (*w/ Enclosures*)
Elizabeth F. Fulton, Esquire (*w/ Enclosures*)