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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM DILLON COUNTY
Court of Common Pleas

OCT 27 2017

Honorable Roger E. Henderson, Circuit Court Judge

SC Court of Appeals

Docket No. 2013-CP-17-335

Tammy Taylor,

Appellant,

v.

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

Respondents.

RESPONDENT'S MOTION TO FILE AND SERVE
FINAL BRIEF OUTSIDE OF FILING DEADLINE

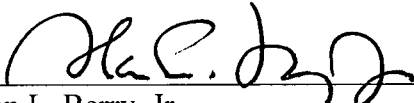
Respondent, A B Country Kitchen, by and through its undersigned counsel respectfully requests leave of the Court to file and serve the Respondent's Final Brief outside of the filing deadline. As grounds for the motion, the Respondent would state the following:

1. The Appellant was late filing her final brief and record on appeal and was required to file a motion to allow the filing past the deadline, which was unopposed by the Respondent.
2. The Court granted the Appellant's motion on October 19, 2017, and notified the Respondent that its final brief was overdue on that same day.
3. The Respondent believed that a ruling on the motion was required before its final brief was due.

4. The Respondent requests that it be allowed to file and serve its final brief outside of the filing deadline set by the Court.

WHEREFORE, for the foregoing reasons, the Respondent respectfully requests leave of the Court to file and serve its final brief outside of the filing deadline set by the Court.

October 26, 2017


Alan L. Berry, Jr.
Attorney for Respondent, A B Country Kitchen
P.O. Box 325
Latta, SC 29565
(843) 418-1155

Other Counsel of Record:

Marcus Woodson
Post Office Box 1657
Marion, South Carolina 29571
(843) 423-1977
Attorney for Appellant, Tammy Taylor

**PROOF OF SERVICE OF RESPONDENT'S MOTION TO FILE AND
SERVE FINAL BRIEF OUTSIDE OF THE FILING DEADLINE**

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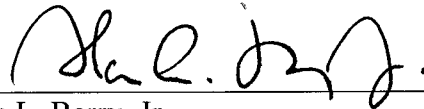
April Springs, Angela Berry, A B Country Kitchen a/k/a A&B Country Kitchen,

Respondents.

PROOF OF SERVICE

I certify that I have served the Respondent's Motion to File and Serve Final Brief Outside of the Filing Deadline on Tammy Taylor by depositing a copy of it in the United States Mail, postage prepaid, on October 26, 2017, addressed to her attorney of record, Marcus Woodson (Post Office Box 1657, Marion, South Carolina 29571).

October 26, 2017



Alan L. Berry, Jr.
Attorney for Respondent, A B Country Kitchen
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Latta, SC 29565
(843) 418-1155

Law Office of
Alan L. Berry, Jr, LLC

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October 26, 2017

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OCT 27 2017
SC Court of Appeals

Jenny Abbott Kitchings
Clerk of South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RE: Tammy Taylor v. April Springs (Appellate Case No. 2017-000679)

Dear Ms. Kitchings:

In regard to the above referenced case, please find enclosed the following:

1. Six Motions to File and Serve Final Brief Outside of the Filing Deadline and Proof of Service
2. Office Account Check #1538 made payable to S.C. Court of Appeals in the amount of \$25.00 as the filing fee for Motion
3. Fifteen Final Briefs of Respondent and Proof of Service

By copy of this letter, I am forwarding a copy of the Motion to File and Serve Final Brief Outside of the Filing Deadline and Proof of Service and Final Brief of Respondent and Proof of Service to the Attorney for the Appellant, Marcus Woodson.

If you have any questions, please do not hesitate to contact my office.

Sincerely,



Alan L. Berry, Jr.

djm

Enclosures

cc: Marcus Woodson
Woodson Law Firm, LLC
P. O. Box 1657
Marion, SC 29571