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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Roger M. Young, Sr.  
Circuit Court Judge

APPELLATE CASE NO. 2017-001131

**RECEIVED**  
JAN 16 2018  
SC Court of Appeals

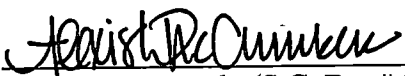
Glenn Gunnells, Individually and as the Personal Representative  
of the Estate of Helen B. Gunnells.....Appellant.

v.

Cathy G. Harkness .....Respondent.

**MOTION TO THE COURT OF APPEALS TO  
RELAX RULE 211(a) AND RULE 210(b), SCACR**

COMES NOW THE Appellant Glenn Gunnells, Individually and as the Personal Representative of the Estate of Helen B. Gunnells, who by and through his undersigned counsel, would move this Honorable Court to relax Rule 211(a) SCACR, allowing counsel to submit nine (9) copies of the Final Briefs, and to relax Rule 210(b) SCACR, allowing counsel to submit nine (9) copies of the Record on Appeal.

  
Robert B. Varnado (S.C. Bar # 0007850)  
Alexis W. McCumber (S.C. Bar # 101611)  
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(843) 737-7300  
*Attorneys for Appellant*

January 12, 2018  
Mount Pleasant, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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v.

Cathy G. Harkness .....Respondent

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**PROOF OF SERVICE**

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The undersigned attorney hereby certifies that a true copy of the *Appellant's Motion to Relax Rules 211(a) and 210(b), SCACR* in the above referenced case has been served upon counsel of record by mailing a copy in an envelope properly addressed with postage prepaid on this date to the following:

Donald H. Howe, Esquire  
**Law Offices of Donald H. Howe, LLC**  
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Julie Jackson Bailey, Esquire  
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*Attorneys for Appellant*

January 18, 2018

Mt. Pleasant, South Carolina

# BROWN & VARNADO LLC

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January 12, 2018

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VIA U.S. MAIL

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

**Re: Glenn Gunnells individually and as the Personal Representative of the Estate of Helen B. Gunnells v. Cathy G. Harkness**  
Appellate Case No.: 2017-001131  
Our File No. 5218

Dear Ms. Kitchings:

Enclosed herewith for filing please find one (1) original and one (1) copy of *Appellant's Motion to Relax Rules 211(a) and 210(b), SCACR*. Upon filing, please return the file-stamped copy in the envelope provided. Additionally, please find our firm's check in the amount of \$25.00 for the required filing fee. By copy of this correspondence, I am providing all Counsel of Record with a copy of the same via U.S. Mail.

Should you have any questions or require anything further, please do not hesitate to contact me.

With kindest regards, I remain

Very truly yours,

BROWN AND VARNADO, LLC

  
Alexis W. McCumber

AWM/

Enclosure(s): as stated

cc: Donald H. Howe, Esquire (*Via U.S. Mail*)  
Michelle Weil, Esquire & Julie Jackson Bailey, Esquire (*Via U.S. Mail*)

Brown & Varnado, LLC  
P.O. Box 1127  
Mount Pleasant, SC 29464

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



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