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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE WILLIAMSBURG COUNTY
COURT OF COMMON PLEAS

RECEIVED

JAN 17 2018

Circuit Court Case No.: 2017-CP-45-0224

Appellate Case No.: 2017-001077

SC Court of Appeals

April Grant Mack, as Personal Representative
of the Estate of Barrett Demetric Jeremiah Mack..... Respondent,

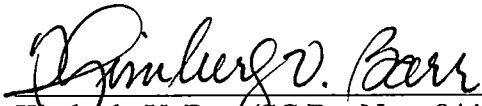
vs.

Necole Binyard, as Personal Representative
of the Estate of Harry Rufus Emmanuel Washington.....Appellant.

**RESPONDENT'S MOTION TO FILE INITIAL
BRIEF OUT OF TIME**

The respondent, by and through her undersigned attorney, hereby moves this Honorable Court for an order allowing her to file her amended initial brief out of time. In support of the motion, the undersigned would show that her personal laptop computer, on which the brief was initially drafted, was infected with a virus. Attempts to remove the virus and restore the document prove unsuccessful. As a result, the document had to be re-typed. Consequently, respondent was unable to file the brief in a timely fashion and would respectfully request that she be permitted to file and serve the brief out of time.

RESPECTFULLY SUBMITTED:

A handwritten signature in black ink, reading "Kimberly V. Barr", written over a horizontal line.

Kimberly V. Barr (SC Bar No.: 8443)

Ronnie A. Sabb (SC Bar No.: 9814)

Sabb Law Group, L.L.C.

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January 16, 2018

Attorneys for Respondent

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ATTORNEYS AND COUNSELORS AT LAW

January 16, 2018

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JAN 17 2018

SC Court of Appeals

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

RE: Estate of Barrett Mack vs. Estate of Harry Washington
Circuit Court Case No.: 2017-CP-45-0224
Appellate Court Case No.: 2017-00107

Dear Ms. Kitchings:

In connection with the matter referenced above, please find enclosed for filing the amended initial brief of the respondent, the designation of matter to be included in the record on appeal, the motion to file the initial brief out of time, and the proof of service. I have enclosed a check in the amount of \$25 to cover the filing cost.

By copy of this letter, I am serving these documents on William J. Barr, counsel for the appellant.

With kindest regards, I

Very truly yours,

Kimberly V. Barr

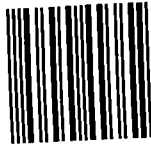
KVB:

enclosures

cc: William J. Barr, Esquire (w/ enclosures)
Jonathan M. Robinson, Esquire (w/ enclosures)
Ashley B. Nance, Esquire (w/ enclosures)



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FROM: (PLEASE PRINT)
Kirkland V. King, Esq.
Sith Law Group, LLC
POB 658
Lake City, SC 29560

PHONE (P. 13) 274-11-22

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TO: (PLEASE PRINT)
The Honorable Jimmy McHale
Chief of Staff to the Governor
POB 11629
Columbia, SC 29211

PHONE () _____

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