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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Case No. 2015-CP-07-00913
Appellate Case No. 2017-002019

RECEIVED
APR 16 2018
SC Court of Appeals

In the matter of the Estate of John Joseph Manning, Jr.

Deanna Bushman, as Holder of Durable Power of Attorney for Sally Manning and as a Trustee of the Trust Agreement of Sally Manning Dated December 6, 2004 Respondent,

v.

The Estate of John J. Manning, Jr.; John J. Manning, III; Christopher Manning, and Linda Manning, Appellants.

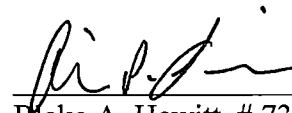
**MOTION FOR THE COURT TO ACCEPT THE
RESPONDENT'S INITIAL BRIEF OUT OF TIME**

Pursuant to Rules 240 and 263(b), SCACR, Respondent hereby moves this Court to accept for filing out of time the initial brief of respondent and designation of matter to be included in the record on appeal. The initial brief of respondent and designation of matter were due to be filed Friday, April 13, 2018.

The initial brief of respondent and designation of matter to be included in the record on appeal are conditionally filed with this motion and served on all other parties.

April 16, 2018

Respectfully submitted,

 with permission and behalf
of

Blake A. Hewitt, # 73674

BLUESTEIN THOMPSON SULLIVAN, LLC

PO Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondent

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Christopher Manning, and Linda Manning, Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellants with a copy of the *Motion for the Court to Accept the Respondent's Initial Brief out of Time* and the conditionally filed *Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Stephen P. Groves, Sr.
R. Bruce Wallace
Nexsen Pruet, LLC
205 King Street, Suite 400
Charleston, SC 29401


Erin Bridges

April 16, 2018

April 16, 2018

VIA HAND DELIVERY

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

RECEIVED
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SC Court of Appeals

Re: Deanna Bushman v. Estate of John Joseph Manning, Jr.
Case Tracking No. 2017-002019

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a Motion for the Court to Accept the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal Out of Time. Also, please find enclosed the conditionally filed original and one (1) copy of the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal. I have also enclosed a proof of service upon counsel for the Appellants and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges
Paralegal to Blake A. Hewitt
Bluestein Thompson Sullivan, LLC

/emb
Enclosures

cc: J. Ashley Twombly, Esquire
Stephen P. Groves, Sr., Esquire
R. Bruce Wallace, Esquire