

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY
COURT OF COMMON PLEAS

Frank D. Addy, Jr., Circuit Court Judge

Case No. 2016-CP-10-3696

RECEIVED

DEC 11 2018

SC Court of Appeals

MARGARET CARR,

Respondent

v.

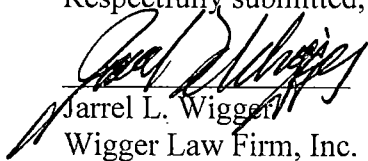
TW GRAHAM and COMPANY, LLC,

Appellant

MOTION TO FILE OUT OF TIME

Pursuant to Rule 240, SCACR, Respondent requests to file her initial brief out of time. The attorney changed and the paralegal changed and there were some confusion as to who was going to file Respondent's Initial Brief. Respondent's Initial Brief was filed and served on Appellant on November 26, 2018.

Respectfully submitted,


Jarrel L. Wigger

Wigger Law Firm, Inc.
8086 Rivers Avenue, Suite A
North Charleston, South Carolina 29406
(843) 553-9800

Attorney for Respondent
Margaret Carr

December 7, 2018

THE STATE OF SOUTH CAROLINA
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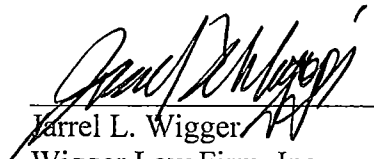
TW GRAHAM and COMPANY, LLC,

Appellant

PROOF OF SERVICE

I certify that I have served the Respondent Margaret Carr's Motion to File Out of Time to Appellant TW Graham and Company, LLC by depositing a copy of the Respondent Margaret Carr's Motion to File Out of Time in the United States Mail, postage prepaid, on December 4, 2018, addressed to their attorneys of record Dennis E. O'Neill, Esquire; O'Neill Law Firm, LLC; 1473 Stuart Engals Blvd.; Mt. Pleasant, South Carolina 29464 and C. Mac Gibson, Jr., Esquire; 1473 Stuart Engals Blvd.; Mt. Pleasant, South Carolina 29464.

December 4, 2018


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JARREL L. WIGGER*
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EMILY H. TONG
MARLEY N. GRIM

*Board Certified Civil Trial Specialist
By National Board of Trial Advocacy

December 7, 2018

Via US Mail

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

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SC Court of Appeals

Re: Margaret Carr, Respondent v. TW Graham and Company, LLC, Appellant
Appellate Case No.: 2018-001738

Dear Ms. Kitchings:

Enclosed please find the original and one copy each of Respondent's Motion to File Out of Time and Motion for Substitution of Counsel in the above appeal. Please file the originals and return the clocked copies in the enclosed envelope.

Per your letter dated November 29, 2018, you have already received our check for the Motion for Extension and will apply that to the Motion to File Out of Time. I have also enclosed our check in the amount of \$50.00 for our Motion for Substitution of Counsel.

If you have any questions, please do not hesitate to contact me. By copy of this letter, we are serving Appellant with a copy of our Motions.

With best regards, I am

Very truly yours,



Teri M. Ranly
Paralegal to Jarrel L. Wigger

/tmr

Encl. as noted

Cc: Dennis E. O'Neill, Esquire
C. Mac Gibson, Jr., Esquire

Wigger Law Firm, Inc.

ATTORNEYS AT LAW
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FIRST-CLASS

