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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

**RECEIVED**

APPEAL FROM DORCHESTER COUNTY DEC 13 2018

Court of Common Pleas

**SC Court of Appeals**

The Honorable Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2018-001372

Common Pleas Case No.: 2016-CP-18-2123

Mary Greene Mackey..... Appellant

vs.

David Bevins..... Respondent

**APPELLANT'S MOTION FOR LEAVE TO  
FILE OUTSIDE OF DEADLINE**

Counsel for Appellant hereby submits a request for leave to file Appellant's Initial Brief outside of the deadline.

Appellant received the hearing transcript from the court reporter on October 2, 2018, setting the deadline to file the Initial Brief as November 1, 2018. Appellant's counsel submitted the Initial Brief, Designation of Matter and Proof of Service by mail postmarked on November 1, 2018. Unfortunately, it came to Appellant's counsel's attention that due to clerical errors in the case caption of the cover letter, and the Designation of Matter that the filing could not be accepted and needed to be resubmitted. The clerical errors were unfortunate and unintentional.

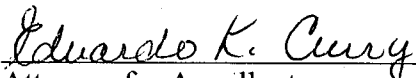
In addition, Appellant's counsel, Eduardo K. Curry, has been traveling back and forth during the last two months between Charleston, South Carolina and Chattanooga, Tennessee to help care for his father who has been hospitalized and battling cancer.

Therefore, the Appellant, by and through her undersigned counsel, is hereby respectfully requesting for leave from this Court to accept a late filing outside of the deadline of the Appellant's Initial Brief, Designation of Matter and Proof of Service.

Appellant's counsel hereby certifies that the content of the Initial Brief remained unchanged from the original submission with the exception to correct the case caption.

**RESPECTFULLY SUBMITTED,**

**THE CURRY LAW FIRM, LLC  
EDUARDO K. CURRY, ESQ.**

  
\_\_\_\_\_  
Attorney for Appellant  
Post Office Box 42270  
North Charleston, South Carolina 29423  
(843) 767-5284  
(843) 767-5286 (Fax)

Dated: 12-10-2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Court of Common Pleas  
The Honorable Diane S. Goodstein, Circuit Court Judge

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Appellate Case No. 2018-001372  
Common Pleas Case No.: 2016-CP-18-2123

**SC Court of Appeals**

Mary Greene-Mackey.....Appellant,

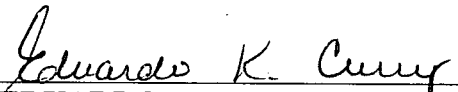
vs.

David Bevins .....Respondent.

**PROOF OF SERVICE**

I certify that I have served the Appellant's Motion for Leave to File Outside Deadline on Respondent, David Bevins, by depositing a copy of it in the United States Mail, postage prepaid, on December 10, 2018, addressed to his attorney of record, Marvin I. Oberman at Oberman & Oberman, 60 Markfield Drive, Ste. 2, Charleston, SC 29407.

December 10, 2018

  
**EDUARDO K. CURRY, ESQUIRE**  
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**ATTORNEY FOR APPELLANTS**

THE  
CURRY LAW FIRM

Attorneys at Law

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1-888-54CURRY (28779)

December 10, 2018

Jenny Abbott Kitchings, Clerk  
V. Claire Allen, Deputy Clerk  
The SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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DEC 13 2018

SC Court of Appeals

RE: Mary Greene-Mackey vs. David Bevins  
Case No. 2018-001372

Dear Ms. Kitchings:

Please find enclosed a check for \$50.00 for a filing fee along with an original and two copies of the following documents:

1. Appellant's Motion for Leave to File Outside of Deadline;
2. Proof of Service of Appellant's Motion for Leave to File Outside of Deadline;
3. Initial Brief of Appellant;
4. Proof of Service of Initial Brief of Appellant;
5. Appellant's Designation of Matter to be Included in the Record on Appeal; and
6. Proof of Service of Designation of Matter to be Included in the Record on Appeal.

Please file the original and return the clocked copies to me in the self address stamped envelope provided.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



The Curry Law Firm, LLC  
Eduardo K. Curry, Esquire

EKC/jld

cc: Marvin Oberman, Esq.

Curry Law Firm, LLC  
PO Box 42270  
North Charleston, SC 29423

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V. Claire Allen, Deputy Clerk  
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