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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
JAN 16 2019
SC Court of Appeals

MARGARET CARR, Respondent

v.

TW GRAHAM and COMPANY, LLC, Appellant.

**APPELLANT'S NOTICE OF MOTION AND MOTION
FOR EXTENSION TO SUBMIT RECORD ON APPEAL**


The Appellant TW Graham and Company, LLC, through its undersigned attorneys filed a Motion to strike #1 and #2 of Respondent Margaret Carr's designation in the Record on Appeal. The Appellant TW Graham and Company, LLC received a letter dated January 10, 2019, from the South Carolina Court of Appeals that the Record on Appeal has to be filed by January 20, 2019 or the appeal would be dismissed.

The Appellant does not have in its possession a copy of Wigger Law Firm Letter Dated May 11, 2016 and Signed Green Card dated June 2, 2016 that Respondent Margaret Carr designated to be included in the Record on Appeal, and such documents were not filed at the Charleston County Clerk of Court. Additionally, the

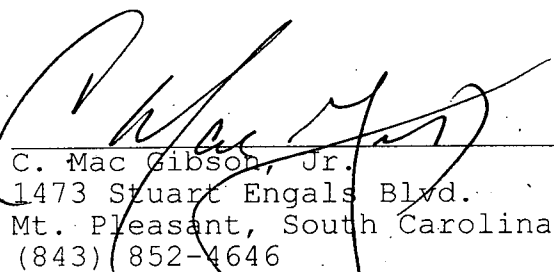
attorneys for Appellant have not been provided a copy of such documents from the attorney for Respondent.

The Appellant respectfully requests this Court to allow the filing of the Record on Appeal to be held in abeyance until the Appellant's Notice of Motion and Motion to Strike has been ruled upon or until the attorney for Respondent has provided such documents to the attorneys for Appellant.

January 14, 2019



Dennis E. O'Neill
O'Neill Law Firm, LLC
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Attorneys for Appellant

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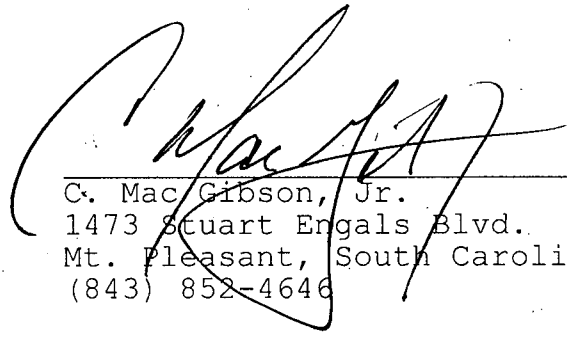
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PROOF OF SERVICE

We certify that we have served the Appellant TW Graham and Company, LLC's Notice of Motion and Motion for Extension to Submit Record on Appeal via the United States Mail, postage prepaid, on January 14, 2019, addressed to her attorney of record, Jarrel L. Wigger, Wigger Law Firm, Inc., 8086 Rivers Ave, Ste. A, North Charleston, South Carolina 29406.

January 14, 2019


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January 14, 2019

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

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

Dear Mrs. Kitchings:

I have enclosed for filing an original and seven (7) copies of the following documents for the above-referenced appeal:

1. Appellant TW Graham and Company, LLC's Motion for Extension to Submit Record on Appeal; and
2. Proof of Service.

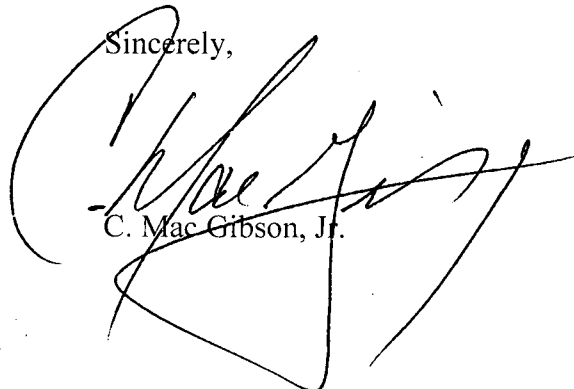
I would appreciate it if you would file the original and six (6) copies of the referenced document and stamp filed the remaining copy and return the filed copy to me in the enclosed stamped self addressed envelope.

I have enclosed a check from my operating account made payable to the South Carolina Court of Appeals in the amount of \$50 for the filing fee.

If you have any questions concerning the enclosed documents, then please contact me.

With kind regards, I am

Sincerely,

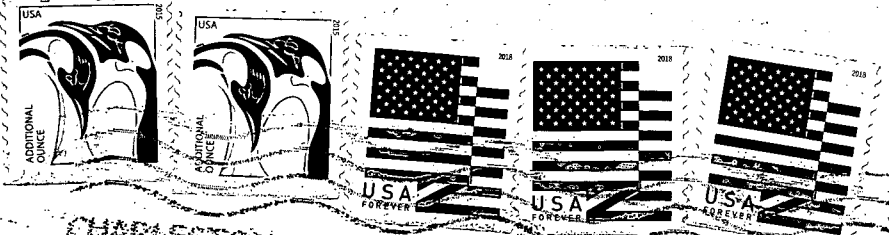
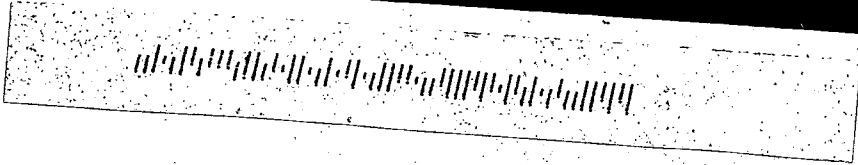


C. Mac Gibson, Jr.

Enclosures (as stated)

cc: Client (w/ encls. via email)
Jarrel L. Wigger, Esq. (w/ encls.)

✓



CHARLESTON SC 294
MON 14 JAN 2019 AM

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Mt. Pleasant, SC 29464

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