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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY

Court of Common Pleas

The Honorable Diane S. Goodstein, Circuit Court Judge

RECEIVED
APR 19 2019
SC Court of Appeals

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 PROOF OF SERVICE OF RECORD ON APPEAL
OUTSIDE OF DEADLINE**

Counsel for Appellant hereby submits a request for leave to file Appellant's Proof of Service of Record on Appeal outside of the deadline.

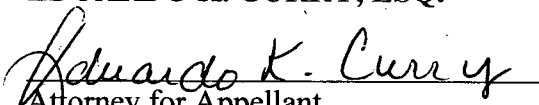
During the last three months, the Appellant's counsel became overwhelmed with deadlines, hearings and trials. At the end of December, early January 2019, Appellant's counsel suffered the loss of his father and was out of state in Tennessee handling the estate. In addition, during February, 2019, Appellant's counsel, who serves as Judicial Council for the worldwide African Methodist Episcopal Church and was required to attend a conference in South Africa for 16 days. Although Appellant's counsel received

protection from court appearances, since his return to the office he has been overwhelmed with a number of court appearances, trial and deadlines.

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 Proof of Service of the Record on Appeal. Appellant's counsel hereby certifies that the Record on Appeal has been served upon opposing counsel.

RESPECTFULLY SUBMITTED,

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


Attorney for Appellant

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Dated: 4-18-19

THE
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April 18, 2019

Jenny Abbott Kitchings
The SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Mary Greene-Mackey
Appellate Case No. 2018-001372

Dear Ms. Kitchings:

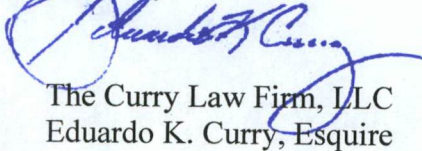
Please find enclosed the following documents for filing:

1. Motion for Leave to File Proof of Service of Record on Appeal with \$50.00 Filing Fee;
2. An original (unbound) and sixteen (bound) copies of Appellant's Final Brief;
3. Proof of Service of Final Brief of Appellant;
4. Certificate of Counsel as to Final Brief;
5. An original (unbound) and sixteen (bound) copies of Record on Appeal; and
6. Proof of Service of 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
Harold Oberman

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