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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas
Doyet A. Early III, Judge

Appellate Case No. 2019-000051
Case No. 2016-CP-02-02576

RECEIVED
JUN 04 2019
SC Court of Appeals

Vivy Haynes Bone,

Appellant,

v.

Robert G. Bone, et al

Respondents.

MEMORANDUM IN RESPONSE TO RESPONDENT'S MEMORANDUM
AND MOTION TO FILE RETURN OUT OF TIME

May 30, 2019

Lexington, S.C.

Other Counsel of Record

Bryan P. Kelley
Attorney for Respondent Liberty Mutual
P.O. Box 188
Greenville, SC 29602

Robert G. Bone, Pro se
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North Augusta, SC 29860

John E. Cheatham Bar# 1206
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Attorney for Appellant

Albert D. Bone, Pro se
803 Vancouver Road
North Augusta, SC 29861

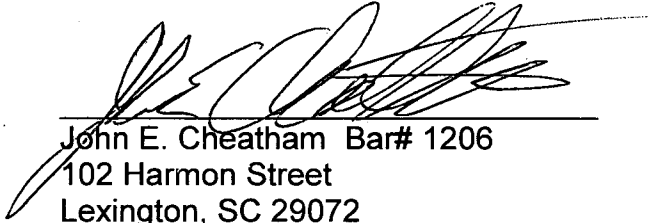
Appellant Vivy Haynes Bone, by and through her counsel, submits that the Return was Timely made as it was filed within 10 days of the Court Of Appeals advising that it was going to hear the Respondent's Motion to Dismiss, which was received on or after May 6, 2019. Prior to that the undersigned believed the Motion was stayed by the Bankruptcy Court

Appellant's attorney received Notice that the Court was going to hear the matter and filed his Response on Friday May 17, 2019, which was within 10 days after receipt of the letter from the Court of Appeals that they were going to hear Respondent's Motion.

If the Court determines the Return was out of Time, then the undersigned moves the Court to be allowed to file such Return Out of Time due to such error.

May 30, 2019

Lexington, S.C.



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Attorney for Appellant

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June 2, 2019

South Carolina Court of Appeals
V. Claire Allen
Deputy Clerk
Post Office Box 11629
Columbia, SC 29211

RECEIVED

JUN 04 2019

SC Court of Appeals

RE: Appellate Case No.: 2019-000051 Case No.: 2016 CP-02-2576

Vivy Haynes Bone

v.

Robert G. Bone, Individually,
and as prior Conservator of Albert D. Bone,
Albert D. Bone, and Liberty Mutual Ins. Co.

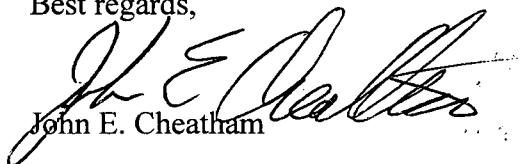
Dear Clerk Allen,

Please find enclosed an original and seven copies of MEMORANDUM IN RESPONSE TO RESPONDENT'S MEMORANDUM AND MOTION TO FILE RETURN OUT OF TIME. I am also enclosing a SASE for your convenience in returning a filed copy to me along with a check for \$50.00 to cover costs.

By copy of this letter, I am also notifying Counsel, Bryan P. Kelley and the other Individual Respondents identified below.

Please contact me if you need any further information.

Best regards,

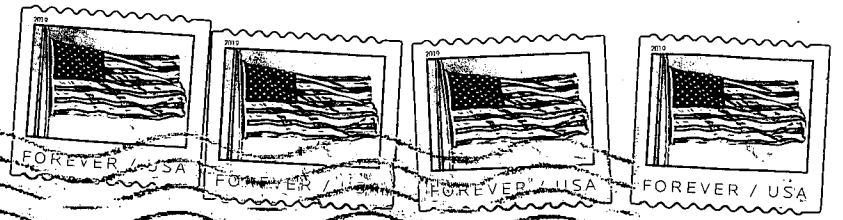

John E. Cheatham

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Lexing



Columbia PSDC 290
MON 03 JUN 2019 PM

South Carolina Court of Appeals
V. Claire Allen
Deputy Clerk
Post Office Box 11629
Columbia, SC 29211

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JUN 04 2019
SC Court of Appeals