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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No. 2018-CP-12-0334
Appellate Case No 2018-001991

RECEIVED
JUN 13 2019
SC Court of Appeals

Angela H. BainAppellant,

v.

Denise C. Lawson and Kenneth L. ChildsRespondents.

**APPELLANT’S MOTION TO ALLOW
LATE FILING OF FINAL REPLY BRIEF**

PLEASE TAKE NOTICE, that pursuant to Rules 211 and 240 of the South Carolina Appellate Court Rules, the Appellant, Angela H. Bain, by and through her undersigned attorney, moves for leave to allow late filing of Appellant’s Final Reply Brief. This motion is the Appellant’s first such request. The ground for this Motion is that the delay was an inadvertent oversight, when filing Appellant’s Final Brief, to not have included the Final Reply Brief in the filing on May 31, 2019. Appellant previously timely filed her Initial Brief and Reply Brief and intends to submit final forms of both Briefs in compliance with Rule 211.

The Appellant believes no party will be prejudiced by the relief sought by this Motion. Counsel for

Appellant has contacted both counsel for each of the Respondents requesting their consent to this motion.

Both counsel for the Respondents have consented.

Respectfully Submitted,

CROMER BABB PORTER & HICKS, LLC

BY: 

J. Lewis Cromer (#1470)

Shannon M. Polvi (#101837)

1418 Laurel Street, Suite A (29201)

Post Office Box 11675

Columbia, South Carolina 29211

Phone 803-799-9530

Facsimile 803-799-9533

Attorneys for Appellant

June 13, 2019

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas
2018-CP-12-00334

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2018-001991

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JUN 13 2019
SC Court of Appeals

Angela H. BainAppellant

v.

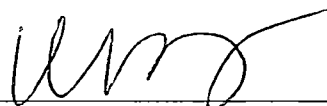
Denise C. Lawson and Kenneth L. Childs Respondents.

PROOF OF SERVICE

I certify that I, the undersigned employee of Cromer Babb Porter & Hicks, LLC, caused to have served Appellant's Motion to Allow Late Filing of Final Reply Brief on counsel for Respondents by delivering a copy via electronic mail and U.S. mail on June 13, 2019, addressed to the following:

Michael H. Montgomery, Esquire
MONTGOMERY WILLARD, LLC
Post Office Box 11886
Columbia, South Carolina 29211-1886
mhm@montgomerywillard.com

Eugene H. Matthews, Esquire
RICHARDSON PLOWDEN & ROBINSON, P.A.
Post Office Drawer 7788
Columbia, South Carolina 29202
gmatthews@richardsonplowden.com

BY: 
Kate M. Ray, Litigation Paralegal

C | B | P | H

CROMER BABB PORTER & HICKS, LLC *Attorneys and Counselors at Law*

J. Lewis Cromer * Julius W. Babb, IV * J. Paul Porter * Ryan K. Hicks
Shannon M. Polvi * Samantha E. Albrecht * Elizabeth M. Bowen

June 13, 2019

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SC Court of Appeals

Via Hand Delivery

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Angela H. Bain v. Kenneth L. Childs and Denise C. Lawson
Appellate Case No.: 2018-001991
Civil Action No.: 2018-CP-12-00334

Dear Ms. Kitchings:

Enclosed please find the original and one copy of **Appellant's Motion to Allow Late Filing** along with this firm's check in the amount of \$50.00 for the fees associated with this Motion.

Also enclosed is the original and fifteen (15) copies of **Appellant's Final Reply Brief** with regard to the above-referenced matter. Also enclosed is the original and one copy of a Proof of Service. Please file the originals and return a copy to our courier.

Please feel free to contact me should you have any questions. Thank you in advance for your attention to this matter.

With highest regards, I am

Sincerely,



Kate M. Ray
Litigation Paralegal

/kmr
Enclosures

Cc: Eugene Matthews, Esquire
Michael Montgomery, Esquire
Client