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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Hon. J. Mark Hayes, II, Circuit Court Judge

APPELLATE CASE NO. 2019-000076

Case No. 2017-CP-10-03110 (Court of Common Pleas)

Carol Manigault,

Appellant,

vs.

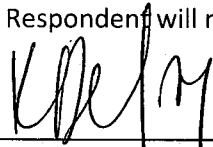
Morris Ellison, Esq. as Personal Representative of
The Estate of Andrew Manigault,

Respondent.

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SEP 24 2019
SC Court of Appeals

**MOTION TO ALLOW LATE FILING OF
RECORD ON APPEAL**

Now comes the Appellant in the above-referenced case who files this Motion requesting that the Record on Appeal be filed late. This request is made in good faith. As a result of Hurricane Dorian and the mandatory evacuation Ordered by Governor McMaster from August 31, 2018 to September 6, 2019, Appellant's counsel was unable to complete the Record on Appeal until now. This request is not made for the purpose of interposing delay or any other inappropriate purpose and Respondent will not suffer any prejudice by this Request.



Dated: 09/23/2019

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(843) 216-6161

(843) 216-1119 (Fax)
Attorney for Appellant

Other Counsel of Record:

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Womble Bond Dickinson, PA
5 Exchange Street
Charleston, SC 29401
Attorney for Respondent

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APPELLATE CASE NO. 2019-000076

Case No. 2017-CP-10-03110

CAROL MANIGUALT,

Appellant,

v.

MORRIS ELLISON, AS PERSONAL
REPRESENTATIVE OF THE ESTATE
OF ANDREW MANIGAULT,

Respondent.

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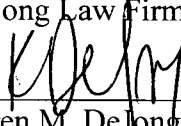
PROOF OF SERVICE

I certify that I have served Appellant's Motion to Allow Late Filing of Record on Appeal, Record on Appeal, Proof of Service, Certificate of Counsel and Certificate of Signature on Morris Ellison, by depositing a copy of it in the United States Mail, via overnight mail, on September 23, 2019, addressed to his attorney of record, James D. Myrick, Esq., Womble Bond Dickinson, LLP, 5 Exchange Street, Charleston, SC 29402.

Dated: September 23, 2019

DeJong Law Firm, LLC

By:



Karen M. DeJong, Esq. -
Bar No. 70699
222 West Coleman Blvd., Ste. 110
Mount Pleasant, SC 29464

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September 23, 2019

SENT VIA OVERNIGHT MAIL
Hon. Jenny Abbott Kitchings
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Carol Manigault v. Morris Ellison, Personal Representative of the Estate of Andrew Manigault
Appellate Case No. 2019-000076

Dear Hon. Kitchings:

Enclosed please find the following documents:

1. Original and six (6) copies of Appellant's Motion to Allow Late Filing of Record on Appeal
2. Original and seven (7) bound copies of Record on Appeal
3. Proof of Service
4. Check in the amount of \$50.00 for the Motion Filing Fee
5. Certificate of Counsel
6. Certificate of Signature

Please return a filed copy in the self-addressed stamped envelope which is enclosed for your convenience.

Very truly yours,


Karen M. DeJong

KMD:abc
Cc: James D. Myrick, Esq.

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