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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas
Grace Gilchrist Knie, Circuit Court Judge

RECEIVED

OCT 18 2019

SC Court of Appeals

Circuit Court Case No. 2018-CP-11-00838
Appellate Case No. 2019-001325

Charles E. Deal, Jr., _____, Appellant

v.

Angela Godfrey, _____ Respondent.

MOTION TO DISMISS APPEAL AS UNTIMELY

Comes now the Respondent and moves for an Order of this Honorable Court dismissing the appeal filed herein on the grounds that the appeal is Untimely.

WHEREFORE, Respondent moves for an Order of Dismissal of Appellant's appeal.



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Rhoden@Winter-Rhoden.com
Attorney for Respondent

Gaffney, South Carolina
Oct. 16, 2019

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHEROKEE)

IN THE APPELLATE COURT
APPELLATE CASE NO.: 2019-001325

Charles E. Deal, Jr.,)
)
Appellant,)

vs.)

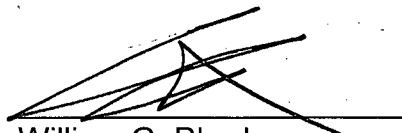
Angela Godfrey,)
)
Respondent.)

**CERTIFICATE OF SERVICE
BY MAIL**

This is to certify that a copy of the **Motion to Dismiss and Memorandum in Support of Motion to Dismiss** in the above referenced case was mailed to:

**James G. Carpenter
The Carpenter Law Firm, PC
819 E. North St.
Greenville, SC 29601**

by depositing same in the United States Mail, postage prepaid, on the 16th day of October, 2019.


William G. Rhoden

Gaffney, South Carolina

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LAW OFFICE OF
WINTER & RHODEN, LLC

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WILLIAM E. WINTER, JR.
(1944 – 2008)

* Licensed in N.C. & S.C.

October 16, 2019

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

RE: Motion to Dismiss Appeal
Charles E. Deal, Jr. vs. Angela Godfrey
Appellate Case No. 2019-001325

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SC Court of Appeals

Dear Ms. Kitchens:

Enclosed please find the following:

1. Original and seven (7) copies of Motion to Dismiss;
2. Original and seven (7) copies of Memorandum in Support of Motion to Dismiss;
3. Original and one (1) copy of Certificate of Service on Opposing Counsel; and
4. Filing Fee of Fifty (\$50.00) Dollars.

I would be greatly appreciative if you would return a filed copy of the Motion to Dismiss, Memorandum in Support of Motion to Dismiss and Certificate of Service in the enclosed self addressed, stamped envelope provided.

With best regards, I am,

Sincerely,



William G. Rhoden

WGR/lmc
cc: file
James G. Carpenter (w/ enclosures)
enclosures