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**THE STATE OF SOUTH CAROLINA**

In The Court of Appeals

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**APPEAL FROM SC WORKERS COMPENSATION FULL COMMISSION JUDICIAL  
CONFERENCE**

Full Commission Judicial Conference

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SCWCC: 1320773  
SC Court of Appeals Case # 2019-001190

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**RECEIVED**  
OCT 28 2019  
SC Court of Appeals

Tammy Jordan,

Respondent,

The Hartford Financial  
Group, Inc,

Appellant.

Resurgent Capital Services

Employer

Interstate Contact Cleaning  
Services, Inc.

Third Party Tortfeasor

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**APPELLANT'S MOTION TO ALLOW LATE FILING FOR APPELLANT'S RETURN  
TO RESPONDENT'S MOTION TO DISMISS**

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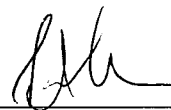
Stephen T. Anderson (SC Bar # 101085)  
Clarkson, Walsh, & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400  
Attorneys for the Appellant

On this 27 day of October, 2019  
Greenville, South Carolina

Appellant seeks this Court to allow for a late filing in regards to a return to Respondent's Motion to Dismiss filed October 3, 2019, pursuant to SCACR 263(b) and SCACR 240 (e), on the grounds that Appellant's counsel was never served a copy of Respondent's motion. (*See attached Affidavit of Tracy D. Brown*). The undersigned was not made aware that a Motion to Dismiss had been filed until he received a call from LaToyla Burns with the Appeals Court at 8:33 am on October 22, 2019. The undersigned spoke with Respondent's co-counsel Samuel Briggs at 10:25 am on the same day. Mr. Briggs expressly told the undersigned that he would consent an enlargement of time to file a return in regards to Respondent's Motion to Dismiss.

As the undersigned was never served with a copy of Respondent's motion, and Respondent's co-counsel has agreed to an enlargement of time to file a return, Appellant moves this Honorable Court to allow for the late filling of the return to Respondent's Motion to Dismiss.

Respectfully Submitted:



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Stephen Anderson  
SC BAR #101085  
Clarkson, Walsh, & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400  
Attorneys for the Appellant

October 23, 2019  
Greenville, South Carolina 29607

STATE OF SOUTH CAROLINA )  
COUNTY OF GREENVILLE )

**AFFIDAVIT OF TRACY D. BROWN**

**PERSONALLY**, appeared before me, Tracy D. Brown, does depose and say as follows:

My name is Tracy D. Brown and I am a paralegal at Clarkson, Walsh & Coulter, P.A. I work directly for Michael T. Coulter, Raymond D. Turner and Stephen T. Anderson.

On July 10, 2019, I personally placed the letter addressed to Amy Bracy, Director for SC Workers' Compensation Commission, Judicial Department, in the mail enclosing for filing the Notice of Appeal. Please see attached as Exhibit A, a copy of the Notice of Appeal that was filed by the SCWCC. I also placed the original and one copy in the mail to the South Carolina Court of Appeals along with our firm's check for the filing fee and placed a copy to Richard Patton in the mail addressed to 819 E. North Street, Greenville, SC 29601.

On September 22, 2019, I personally cured the deficiency that was required by the South Carolina Court of Appeals by placing the Designation of Matter on Appeal along with a copy of the initial letter to the South Carolina Workers' Compensation Commission in the mail to the South Carolina Court of Appeals and a copy to Richard Patton at the following address: 819 E. North Street, Greenville, SC 29601.

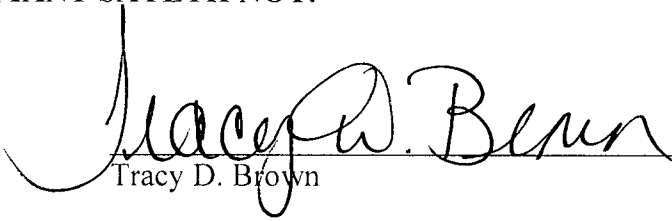
On October 22, 2019, I was notified by Stephen Anderson that a Motion to Dismiss had been filed in the matter of Tammy Jordan v. The Hartford Financial Group, Inc., et al. I receive, open, and archive all of Mr. Anderson's mail on a daily basis. Our office has never received a copy of the Motion to Dismiss nor the Proof of Service that was filed with the South Carolina Court of Appeals on October 3, 2019. We have a copy now as I downloaded it from the C-Tracking System.

**RECEIVED**

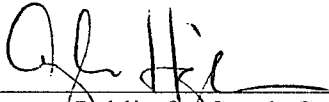
OCT 28 2019

**SC Court of Appeals**

AND FURTHER THE AFFIANT SAYETH NOT.

  
Tracy D. Brown

SWORN to and before me this  
23<sup>rd</sup> day of October, 2019.

  
Notary Public for South Carolina  
My Commission Expires 12/3/2023

**ANGELA HIGHHOUSE**  
Notary Public, State of South Carolina  
My Commission Expires 12/3/2023

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SC WORKERS COMPENSATION FULL COMMISSION  
JUDICIAL CONFERENCE  
Full Commission Judicial Conference

SCWCC: 1320773  
SC Court of Appeals Case # 2019-001190

Tammy Jordan,

Respondent,

v.

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Interstate Contact Cleaning  
Services, Inc.

Appellant.

Employer  
Third Party Tortfeasor

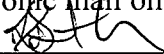
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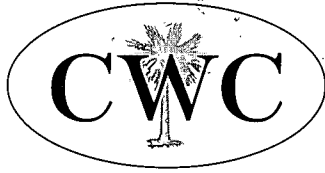
**SC Court of Appeals**

**PROOF OF SERVICE OF APPELLANT'S MOTION TO ALLOW LATE  
FILING FOR APPELLANT'S RETURN TO RESPONDENT'S MOTION TO  
DISMISS AND APPELLANT'S RETURN TO RESPONDENT'S MOTION  
TO DISMISS**

I certify that I have served the Appellant's Motion to Allow Late Filing for Appellant's Return to Respondent's Motion to Dismiss and Appellant's Return to Respondent's Motion to Dismiss on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on October 24, 2019, addressed to her attorneys of record, Samuel Briggs and Richard Patton, 819 E. North Street, Greenville, SC 29601 and via electronic mail on October 23, 2019.

  
Stephen T. Anderson (SC Bar #101085)  
Clarkson, Walsh & Coulter, P.A.  
P.O. Box 6728  
Greenville, SC 29606  
(864) 232-4400  
Attorneys for Appellant

Greenville, SC  
October 23, 2019



CLARKSON | WALSH | COULTER

<sup>Attorneys at Law</sup>  
**Stephen T. Anderson**

[sanderson@clarksonwalsh.com](mailto:sanderson@clarksonwalsh.com)

(864)232-4400

October 23, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of Court for the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
OCT 28 2019  
SC Court of Appeals

Re: Tammy Jordan v. Resurgent Capital Services  
SC Court of Appeals Case # 2019-001190

Dear Ms. Kitchings:

Enclosed herewith, please find an original and corresponding copies of the Appellant's Motion to Allow Late Filing for Appellant's Return to Respondent's Motion to Dismiss and Appellant's Return to Respondent's Motion to Dismiss on Respondent in the above-referenced case, and check for \$50.00 filing fee. Please file the originals in your office and return the filed copies to me in the self-addressed stamped envelope provided for your convenience.

Should you have any questions or require further information, please do not hesitate to contact me.

Very truly yours,

Clarkson, Walsh & Coulter, P.A.

Stephen T. Anderson

/tdb

Enclosures

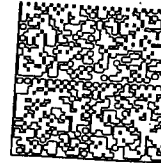
cc: Richard Patton, Esq. (w/enclosures)  
Samuel Briggs, Esq.

GREENVILLE – POST OFFICE BOX 6728, GREENVILLE, SC 29606

CHARLESTON – POST OFFICE BOX 2219, MOUNT PLEASANT, SC 29465

PHONE: 864-232-4400 • FAX: 864-235-4399

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CLARKSON | WALSH | COULTER  
Attorneys at Law

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