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STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

APPELLATE CASE NO. 2019-001609

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NOV 20 2019
SC Court of Appeals

Rachel Farley, as Trustee of the Louise Farley Revocable Trust Dated February 8, 2005;
Rachel R. Farley,.....Appellants,

v.

Church of the Harvest of Columbia, Inc.,..... Respondent.

**MOTION TO FILE RESPONSE TO RESPONDENT’S MOTION OUT OF TIME
AND TO EXTEND TIME TO FILE APPELLANTS’ RESPONSE TO
RESPONDENT’S MOTION**

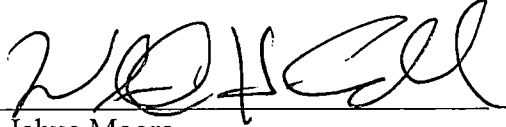
Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the Appellants Rachel Farley, as Trustee of the Louise Farley Revocable Trust; and Rachel Farley, as an individual, respectfully move for permission to file a response to Respondent’s Motion Out of Time and for an extension of time to file and serve their Initial Return to the Respondent’s Motion to Stay Appeal, to Dismiss Appellants’ Notice of Appeal As Untimely, or alternatively to Limit Issues On Appeal With Supporting Authorities. The Appellants also move to include filing these pleadings out of the time limits prescribed by Rule 208 of the South Carolina Rules of Appellate Procedure. Appellants respectfully request twenty (20) days from the date of this motion (November 20, 2019) to file their Initial Return to the Respondent’s Motion to Stay Appeal, to Dismiss Appellants’ Notice

of Appeal As Untimely, or alternatively to Limit Issues On Appeal With Supporting Authorities. If granted by this Court, the Appellants' Initial Return to the Respondent's Motion to Stay Appeal, to Dismiss Appellants' Notice of Appeal As Untimely, or alternatively to Limit Issues On Appeal With Supporting Authorities would be due on or before December 10, 2019.

This motion is based on the grounds that prior work commitments and deadlines, coupled with the internal miscommunications resulted in confusion as to the applicable deadlines, giving rise to an inadvertent delay in preparing and filing their Initial Return to the Respondent's Motion to Stay Appeal, to Dismiss Appellants' Notice of Appeal As Untimely, or alternatively to Limit Issues On Appeal With Supporting Authorities.

THEREFORE, the Appellants respectfully request and move that they be granted an additional twenty (20) days to prepare, file and serve their Initial Return to the Respondent's Motion to Stay Appeal, to Dismiss Appellants' Notice of Appeal As Untimely, or alternatively to Limit Issues On Appeal With Supporting Authorities and to be allowed to file their Initial Return to the Respondent's Motion to Stay Appeal, to Dismiss Appellants' Notice of Appeal As Untimely, or alternatively to Limit Issues On Appeal With Supporting Authorities out of the time limits prescribed by Rule 208 of the South Carolina Rules of Appellate Procedure on or before December 10, 2019.

Respectfully submitted,

By: 

S. Jahue Moore

William H. Edwards,

MOORE TAYLOR LAW FIRM, PA

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Attorneys for Appellant Rachel Farley, as
Trustee of the Louise Farley; and Rachel R.
Farley

West Columbia, SC
November 20, 2019

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
In the Court of Common Pleas

Alison Renee Lee, Circuit Court Judge
Civil Action No.: 2016-CP-32-00387

Case No. 2019-001609

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SC Court of Appeals

Rachel Farley's Trustee of the Louise Farley Revocable Trust
Dated February 8, 2005; Drummond B. Farley; Rachel R.
Farley; Carol E. Farley; & Nancy E. Farley,Appellant,

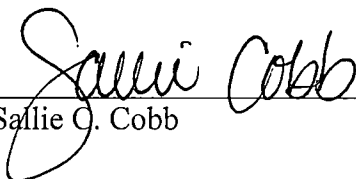
v.

Church of the Harvest of Columbia, Inc.,Respondent.

PROOF OF SERVICE

I certify that I have served the Motion to File the Response to Respondents' Motion Out of Time and to Extend Time to File Appellant's Response to Respondent's Motion by US Mail, postage prepaid, upon counsel for the Respondent at the address listed below:

Robert W. Dibble, Jr., Esq.
PO Box 1000
Chapin, SC 29036



Sallie C. Cobb

November 20, 2019

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Lester McGill Bell, Jr.
Bryan C. Letteer
Edward Hood Dawson
Sierra D. Carini

Robert D. Hazel†
C. David Sawyer, Jr.‡
Billy C. Coleman
1916-2019

November 20, 2019

VIA HAND DELIVERY

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

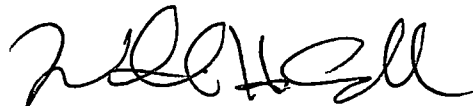
RE: Rachel Farley's Trustee of the Louise Farley Revocable Trust Dated February 8, 2005; Drummond B. Farley; Rachel R. Farley; Carol E. Farley; & Nancy E. Farley v. Church of the Harvest of Columbia, Inc.
Appellate No.: 2019-001609
C/A: 2016-CP-32-00387

Dear Ms. Kitchings:

Enclosed for filing is a Motion to File the Response to Respondents' Motion Out of Time and to Extend Time to File Appellant's Response to Respondent's Motion. Also enclosed is the filing fee associated with this Motion.

If you have any questions or need additional information, please do not hesitate to call.

Sincerely,



William H. Edwards

WHE/scc

Enclosures

Cc: Robert W. Dibble, Jr., Esq.

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