

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2016-CP-40-04139
Appellate Case No. 2019-001533

RECEIVED
JAN 13 2020
SC Court of Appeals

Morgan Conley,Appellant,

v.

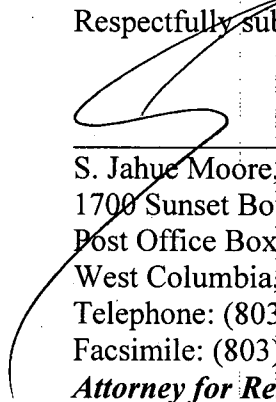
April Morganson,Respondent.

MOTION TO FILE DESIGNATION OF MATTER OUT OF TIME

The undersigned, as counsel for Respondent, April Morganson, hereby respectfully moves this Court for permission to file the Designation of Matter outside of the deadlines established by Rule 211 SCAR. The failure to file the Designation of Matter was inadvertent. This request is not intended for purposes of delay. The Designation of Matter is being submitted concurrently with this motion.

WHEREFORE, Respondent respectfully prays that this Court allow the Final Brief of Respondent to be filed out of time.

Respectfully submitted,



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Attorney for Respondent

January 13, 2020

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Clifton Newman, Circuit Court Judge

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JAN 13 2020

Civil Action No. 2016-CP-40-04139
Appellate Case No. 2019-001533

SC Court of Appeals

Morgan Conley.....Plaintiff/Appellant,

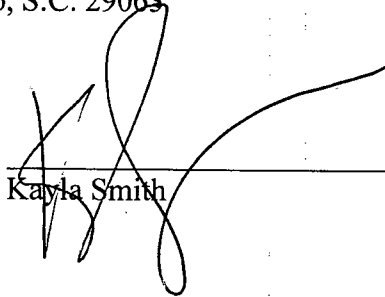
vs.

April Morganson.....Defendant/Respondent.

PROOF OF SERVICE

I, Kayla Smith, an employee of Moore Taylor Law Firm, hereby certify that I have caused Return to Appellant's Motion to Strike Undesignated Matter, a Motion to File Designation of Matter Out of Time, Respondent's Designation of Matter to Be Included in Record on Appeal, Respondent's Final Brief and this Proof of Service, to be served via U.S. Mail as addressed below on January 13, 2020.

Richard L. Whitt, S.C. Bar# 62895
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Irmo, S.C. 29063



Kayla Smith

West Columbia, SC