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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 16 2020
SC Court of Appeals

Morgan Conley,Appellant,

v.

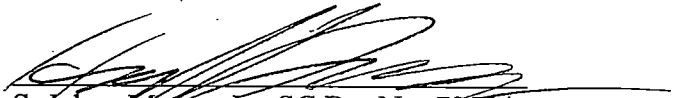
April Morganson,Respondent.

MOTION TO FILE RETURN TO MOTION TO STRIKE OUT OF TIME

The undersigned, as counsel for Respondent, April Morganson, hereby respectfully moves this Court for permission to file the Return to Motion to Strike outside of the deadlines established by Rule 211 SCAR. The failure to file the Return to Motion to Strike was inadvertent. This request is not intended for purposes of delay.

WHEREFORE, Respondent respectfully prays that this Court allow the Return to Motion to Strike to be filed out of time.

Respectfully submitted,



S. Jahue Moore, Jr., SC Bar No. 72584

1700 Sunset Boulevard

Post Office Box 5709

West Columbia, South Carolina 29171

Telephone: (803) 796-9160

Facsimile: (803) 791-8410

Attorney for Respondent

January 16, 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

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

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Morgan Conley.....Plaintiff/Appellant,

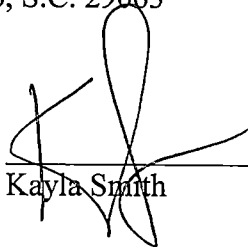
vs.

April Morganson.....Defendant/Respondent.

PROOF OF SERVICE

I, Kayla Smith, an employee of Moore Taylor Law Firm, hereby certify that I have caused a Motion to File Return to Motion to Strike Out of Time and this Proof of Service, to be served via U.S. Mail as addressed below on January 16, 2020.

Richard L. Whitt, S.C. Bar# 62895
Richard L. Whitt
Whitt Law Firm, LLC
PO Box 362
Irmo, S.C. 29063



Kayla Smith

West Columbia, SC