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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
CIRCUIT COURT

RECEIVED

JAN 17 2020

Robert E. Hood, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2019-000624

Dottie R. Bell.....Appellant,

v.

John C. BentleyRespondent.

**MOTION TO FILE APPELLANT’S INITIAL REPLY BRIEF AND
DESIGNATION OF MATTER OUT OF TIME**

Appellant, by and through her undersigned attorney hereby moves this Honorable Court for a 20-day extension in which to file her Initial Reply Brief and to accept the Appellant’s Initial Reply Brief as timely filed. The Initial Reply Brief was due on December 30, 2019 (as December 28th was on a Saturday). If the extension is granted, the Initial Reply Brief would be due on January 17, 2020.

Upon preparing the reply brief for filing, Counsel for Appellant realized that he had inadvertently calendared the deadline to file the brief 30 days after Respondent filed its initial brief instead of the 10 days set forth in Rule 208(a)(3). Counsel for Appellant has multiple appellate cases at various stages of the appellate process and confused this filing with one that had a 30 day response time.

Appellant is contemporaneously filing its Initial Reply Brief with this motion and asks that the court grant this motion and accept its Initial Reply Brief as timely filed. Appellant asserts that granting this motion will cause no prejudice against Respondent.

T. Jeff Goodwyn, Jr., SC Bar No. 73789
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
Attorney for Appellant

Columbia, South Carolina
January 17, 2020

THE STATE OF SOUTH CAROLINA
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Dottie R. Bell.....Appellant,

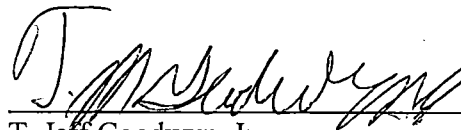
v.

John C. Bentley,.....Respondent.

PROOF OF SERVICE

I certify that I have served the **Motion to File Appellant's Initial Reply Brief and Designation of Matter out of Time**, by depositing a copy of same in the United States Mail, postage prepaid, on **January 17, 2020** on the following parties, addressed as follows:

Carrie H. O'Brien, Esquire
Walker Allen Grice Ammons & Foy, LLP
1819 Charlotte Dr., Suite 210
Charlotte, North Carolina 28203



T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
Attorney for Appellant

January 17, 2020

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
C. David Beale, Jr.*

Reply to:
2519 Devine Street
Suite A
Columbia, South Carolina 29205

111-B Congress Street
Winnsboro, South Carolina 29180

Tel. (803) 251-4517 (Columbia)
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Tel. (803) 635-1920 (Winnsboro)
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Email: jgoodwyn@goodwynlaw.com
dbeale@goodwynlaw.com
Web: www.goodwynlaw.com

*Also Licensed in Georgia

January 17, 2020

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Dottie R. Bell v. John C. Bentley
Appellate Case No.: 2019-000624
Our File No.: 8000-0260

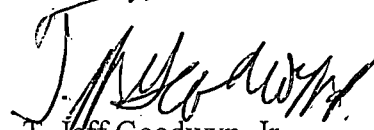
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the **Initial Reply Brief of Appellant** and **Designation of Matter**, along with the Proof of Service, in regards to the above-referenced matter.

By copy of this letter and as evidence on the attached Proof of Service, I am serving a copy of same upon Carrie H. O'Brien, Esquire, attorney for the Respondent.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Carrie H. O'Brien, Esquire

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JAN 17 2020
SC Court of Appeals

GOODWYN LAW FIRM, LLC

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C. David Beale, Jr.*

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January 17, 2020

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Dottie R. Bell v. John C. Bentley
Appellate Case No.: 2019-000624
Our File No.: 8000-0260

RECEIVED
JAN 17 2020
SC Court of Appeals


Dear Ms. Kitchings:

Enclosed for your consideration, an original and one copy of a Motion to File Appellant's Initial Reply Brief and Designation of Matter out of Time along with a check in the amount of \$50.00 representing the filing fee in regards to the above referenced matter. Please return a filed copy of same with the courier.

By copy of this letter and as evidence on the attached Proof of Service, I am serving a copy of same upon Carrie H. O'Brien, Esquire, attorney for the Respondent.

Should you have any questions, please do not hesitate to contact me.

Sincerely,


T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Carrie H. O'Brien, Esquire