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JUL 13 2020

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM COUNTY OF GREENVILLE  
Court of Equity

Charles B. Simmons, Jr., Circuit Court Judge

Appellate Case No.: 2020-000419

Southeastern Sureties Group, Inc. ....Respondent,

vs.

Michael E. Curlee, and wife Karin M. Curlee; and Michael E. Curlee, and wife Karin M. Curlee,  
d/b/a All Out Bonding, Appellants, .....Appellants.

**MOTION TO REINSTATE APPEAL AND TO REQUEST TRANSCRIPT OUT OF  
TIME**

Counsel for Appellant hereby requests that this Court reinstate the Appeal in this matter and for permission to request the transcript out of time. This matter is made for good cause. Counsel for Appellants will file a memorandum in support of this motion further explaining why this relief should be granted.

Date: July 7, 2020

A handwritten signature in black ink that reads "Kenneth C. Gibson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

---

Kenneth Gibson (S.C. Bar No. 0069288)  
THE LAW OFFICE OF KENNETH GIBSON  
Post Office Box 5536  
Greenville, SC 29606  
(864) 241-6699

*Attorney for Appellant*

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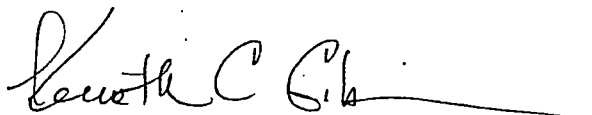
Michael E. Curlee, and wife Karin M. Curlee; and Michael E. Curlee, and wife Karin M. Curlee,  
d/b/a All Out Bonding, Appellants, .....Appellants.

**PROOF OF SERVICE**

The undersigned hereby certifies that he is a person of such age and discretion as to be competent to serve process and that on this day, he served a copy of the attached **MOTION TO REINSTATE APPEAL AND TO REQUEST TRANSCRIPT OUT OF TIME** upon The Respondent by electronic mail to:

Joshua Jennings Hudson

Date: July 7, 2020



Kenneth Gibson

**Kenneth C. Gibson**  
Attorney at Law

Post Office Box 5536 • Greenville, SC 29606  
Phone: (864) 241-6699 • Facsimile: (864) 241-6211

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**SC Court of Appeals**

July 7, 2020

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

**RE: Southeastern Sureties Group, Inc. v. Michael Curlee, et al.**  
**Appellate No. 2020-000419**

Dear Honorable Ms. Kitchings:

Please find enclosed the original copy of Appellants' Motion to Reinstate Appeal and for Permission to Request Transcript Out of Time along with the necessary filing fee of \$50.00

Should you have any questions please contact me at your earliest convenience.

Sincerely,



Kenneth Gibson

Enclosures

Kenneth Gibson  
Kenneth Gibson  
205 Verdae Blvd, Unit 1421  
Greenville SC 29607-7806



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The South Carolina Court of Appeals  
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