

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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OCT 22 2020

SC Court of Appeals

APPEAL FROM SUMTER COUNTY
In the Court of Common Pleas

Dale Atkinson, Presiding Judge

Appellate Case No. 2020-000782

In the Matter of Estate of Herbert Franklin Dickson, Jr.
Milton Oakley Dickson, Appellant,

v.

Arthur B. Beasley, Jr., as Personal Representative
of the Estate of Herbert F. Dickson, Sr., Respondents,

MOTION TO FILE RECORD ON APPEAL OUT OF TIME

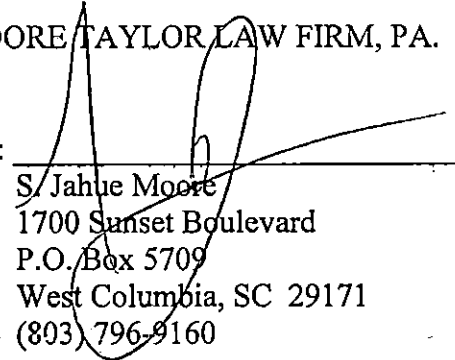
The undersigned, as counsel for Appellant, In the Matter of Estate of Herbert Franklin Dickson, Jr. Milton Oakley Dickson, hereby respectfully to file the Record on Appeal outside of the deadlines established by Rule 210 SCAR. Appellant's counsel experienced a change in staffing and disruption in normal business operations. Appellant respectfully moves this Court for a 30 day extension of time to serve and file the Record of Appeal. The failure to file the Record on Appeal was inadvertent and due to extraordinary circumstances. This request is not intended for purposes of delay. Further, there would be no prejudice to the parties by allowing the Respondent to file the Record on Appeal outside of the deadlines

WHEREFORE, Respondent respectfully prays that this Court allow the Record on Appeal of Appellant to be filed out of time.

Respectfully submitted,

MOORE TAYLOR LAW FIRM, PA.

BY: _____


S. Jahue Moore
1700 Sunset Boulevard
P.O. Box 5709
West Columbia, SC 29171
(803) 796-9160

ATTORNEY FOR APPELLANT

West Columbia, South Carolina
October 20, 2020

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY
PROBATE COURT

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In the Matter of Estate of Herbert Franklin Dickson, Jr.
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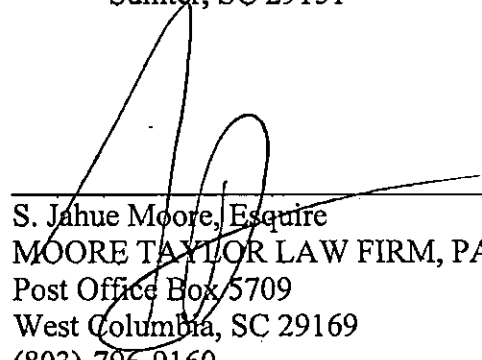
Arthur B. Beasley, Jr., as Personal Representative
of the Estate of Herbert F. Dickson, Sr., Respondent,

PROOF OF SERVICE

I certify that I have served the Motion to File Record on Appeal Out of Time by depositing a copy of it
in the United States Mail, postage prepaid, on October 20, 2020, to the following individuals:

Kenneth R. Young, Jr., Esquire
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23 West Calhoun Street
Sumter, SC 29150

J. Cabot Seth, Esquire
JONES SETH & JONES, LLP
Post Office Box 1268
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ATTORNEYS FOR APPELLANT

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Sierra D. Carini
Nicole E. Jackson

J. Mark Taylor*
Robert D. Hazel*
C. David Sawyer, Jr.*
Billy C. Coleman
1916-2019

October 20, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: In the Matter of Estate of Herbert Franklin Dickson, Jr., Milton Oakley Dickson vs.
Arthur B. Beasley, Jr., as Personal Representative of the Estate of Herbert F. Dickson, Sr.
C.A. No.: 2020-000782

Dear Ms. Kitchings:

You will please find enclosed the original and a copy of the Motion to File Record of Appeal Out of Time and Proof of Service. Also enclosed is check in the amount of \$25.00 for the filing fee. I would appreciate your filing the original in your office and returning the filed copy to me in the envelope provided for your convenience.

Thank you in advance for your assistance in this matter.

Yours very truly,

S. Jahue Moore

SJM:dc

cc: Kenneth R. Young, Jr., Esquire
J. Cabot Seth, Esquire

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PO Box 5709, West Columbia SC 29171
1700 Sunset Boulevard, West Columbia SC 29169



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