

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Perry H. Gravely, Circuit Court Judge

Appellant Case No. 2020-00631

Mary Earle,.....Respondent,

v.

Boulder LP,.....Appellant.

RESPONDENT'S MOTION TO PROCEED WITHOUT COSTS

Vanessa Cason, Esquire, represents the Respondent, Mary Earle, under the auspices of the South Carolina Legal Services. Counsel for Respondent hereby moves to proceed with the Respondent's Motion to Include Respondent's Designated Matter in Record on Appeal without payment of fees or costs. Counsel affirms that the Respondent is indigent and cannot afford to bear the costs of this motion. Counsel requests that the Respondent, Mary Earle, not be required to pay the filing fee and costs associated with this appeal.

February 1, 2021

s/Vanessa Cason
Vanessa Cason
Post Office Box 2842
Greenville, SC 29602
Telephone: (803) 277-9093
Electronic mail: vanessa@vcasonlaw.com
Attorney for Respondent

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PROOF OF SERVICE

I certify that on this February 1, 2021, I have served the Respondent’s Motion to Proceed Without Costs on the Appellant’s counsels of record via electronic service to the email addresses listed below:

Emily Bridges: ebridges@foxrothschild.com

Kevin McCarrell: kmccarrell@foxrothschild.com

Greenville, South Carolina
February 1, 2021

s/Vanessa Cason
Vanessa Cason, Esq. (SC Bar #69896)
Post Office Box 2842
Greenville, SC 29602
Telephone: (864) 277-9093
Facsimile: (864) 277-3627
Electronic Mail: vanessa@vcasonlaw.com
Attorney for Respondent