

MOTION TO FILE OUT OF TIME

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Feb 19 2021

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-CP-23-01213

JAMES EARL TEGELER,

Appellant,

v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

MOTION TO FILE OUT OF TIME

Appellant James Earl Tegeler respectfully requests the Court to allow Appellant to file Appellant's brief and designated matter out of time within the next thirty (30) days on the proposed date of March 19, 2021. Respondents received written notice of entry of this order via electronically on February 19, 2021.

Respectfully submitted this 19 day of February, 2021.

DICKSON DAVIS LAW FIRM, LLC

/s/ Deborah D. Davis, Esq.

Deborah D. Davis, Esq.

SC Bar No.: 102942

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ATTORNEY FOR APPELLANT

Other Counsel of Record:

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Daniel R. Hughes
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ATTORNEYS FOR THE RESPONDENTS

PROOF OF SERVICE OF MOTION TO FILE OUT OF TIME

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JAMES EARL TEGELER,

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v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
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NORTHGATE BAPTIST
CHURCH,

Respondents.

PROOF OF SERVICE

I certify that I have served Appellant’s Motion to File Out of Time on Respondents **CHARLOTTE COLLIER, HANNAH ELIZABETH COLLIER, LINDA SMITH, NORTHGATE BAPTIST CHURCH** electronically and by depositing a copy of it in the United States Mail, postage prepaid, or by South Carolina Supreme Court Order 2020-05-29-02, on February 19, 2021, addressed to the attorney of record, to the following address(es):

Northgate Baptist Church
c/o Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Charles E. McDonald & S. Michael Nail
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Respectfully submitted this 19 day of February, 2021.

DICKSON DAVIS LAW FIRM, LLC

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ATTORNEY FOR APPELLANT



DICKSON DAVIS LAW FIRM

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SC Court of Appeals

NOTICE OF MOTION

February 19, 2021

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

VIA EMAIL CTAPPFILINGS@SCCOURTS.ORG

Re : Tegeler v. Collier et al.
Case No. : 2020-CP-23-01213
Appellate Case No. : 2020-001525
File Id. : 2018-01-123

Dear Clerk of Court:

This letter is to inform you of the motion to file out of time for Appellant to file a brief and designated matter in thirty (30) days by March 19, 2021. The requisite \$50.00 has been mailed accordingly. See attached.

Please let me know what further you require from me at this time. Thank you for assistance with this matter.

Respectfully submitted this 19 day of February, 2021

Deborah D. Davis, Esq.
SC Bar No.: 102942
Attorney for Appellant

cc: Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
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Clerk of Court
1220 Senate Street
P.O. Box 11629
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