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Feb 19 2021

SC Court of Appeals

MOTION TO FILE OUT OF TIME

THE STATE OF SOUTH CAROLINA
In The 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

310 Rutherford Street

Greenville, SC 29609

(864) 729-3428 t
(864) 752-1424 f
d.davis@dicksondavislaw.com
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ATTORNEY FOR APPELLANT

Other Counsel of Record:
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Charles E. McDonald & S. Michael Nail
300 North Main Street
P.O. Box 2757
Greenville, SC 29602
(864) 241-1813

Clawson and Staubes, LLC
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Duggan & Hughes, LLC
Daniel R. Hughes
457-B Pennsylvania Avenue
P.O. Box 449
Greer, SC 29652
(864) 334-2500

ATTORNEYS FOR THE RESPONDENTS

PROOF OF SERVICE OF MOTION TO FILE OUT OF TIME

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Alex Kinlaw, Jr., Circuit Court Judge

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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
300 North Main Street
P.O Box 2757
Greenville, SC 29602

Charlotte Collier
c/o Clawson and Staubes, LLC
Amy S. Snyder
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Greenville, SC 29601

Hannah Elizabeth Collier and Linda Smith
c/o Duggan & Hughes, LLC
Daniel R. Hughes
457-B Pennsylvania Avenue
P.O. Box 449
Greer, SC 29652

Respectfully submitted this 19 day of February, 2021.

DICKSON DAVIS LAW FIRM, LLC

/s/ Deborah D. Davis, Esq.
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ATTORNEY FOR APPELLANT

From: [Deborah Davis](#)
To: kbush@clawsonandstaubes.com; teri.atkinson@ogletree.com; kristin.holt@ogletreedeakins.com; asnyder@clawsonandstaubes.com; dhughes@dugganughes.com; charles.mcdonald@ogletreedeakins.com; michael.nail@ogletreedeakins.com; [Tilda Burgess](#); [Sasha Smith](#); [Shana Henderson](#); legalassistant@dicksondavislaw.com; hjenkins@sccourts.org
Cc: [Court Of Appeals Filings](#)
Subject: Motion for Filing Out of Time for James Earl Tegeler v. Charlotte Collier 2020-001525
Date: Friday, February 19, 2021 2:44:00 PM
Attachments: [2021_02_19_cover_letter_check_envelope.pdf](#)
[image001.png](#)
[2021_02_19_motion_file_out_time.pdf](#)
[2021_02_19_motion_file_out_time_POS.pdf](#)

To all:

Please see the attached motion filed with the Clerk of Court for the South Carolina Appellate Court.

Best Regards,



Deborah D. Davis, Esq.
Attorney at Law

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Feb 19 2021
SC Court of Appeals

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From: Deborah Davis

Sent: Friday, February 19, 2021 10:00 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: kbush@clawsonandstaubes.com; teri.atkinson@ogletree.com; kristin.holt@ogletreedeakins.com; asnyder@clawsonandstaubes.com; dhughes@dugganhughes.com; charles.mcdonald@ogletreedeakins.com; michael.nail@ogletreedeakins.com; 'Tilda Burgess' <tburgess@dugganhughes.com>; 'Sasha Smith' <:ssmith@clawsonandstaubes.com>; Singleton, Mary C. <msingleton@sccourts.org>; 'Clark, Tyler P.' <tpclark@sccourts.org>; Shana Henderson <1099contractor@dicksondavislaw.com>; legalassistant@dicksondavislaw.com; hjenkins@sccourts.org

Subject: RE: Transcript for James Earl Tegeler v. Charlotte Collier 2020-001525

To the Clerk of Court:

Please see the attached letter and exhibits in response to the email and letter below. Please inform me of anything else you require to cure this defect for the transcript regarding this appellate case.

Best Regards,



Deborah D. Davis, Esq.

Attorney at Law

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From: Clark, Tyler P. <tpclark@sccourts.org>

Sent: Wednesday, February 17, 2021 3:38 PM

To: asnyder@clawsonandstaubes.com; dhughes@dugganhughes.com; charles.mcdonald@ogletreedeakins.com; michael.nail@ogletreedeakins.com; Deborah Davis <d.davis@dicksondavislaw.com>

Cc: kbush@clawsonandstaubes.com; teri.atkinson@ogletree.com; kristin.holt@ogletreedeakins.com; Shana Henderson <1099contractor@dicksondavislaw.com>; Singleton, Mary C. <msingleton@sccourts.org>

Subject: James Earl Tegeler v. Charlotte Collier 2020-001525

Dear Counsel,

Please find correspondence from the Court of Appeals.

Sincerely,

Tyler Clark

Appeals Specialist
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201
Ph. (803) 734-1890
F. (803) 734-1839

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DICKSON DAVIS LAW FIRM

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Feb 19 2021

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

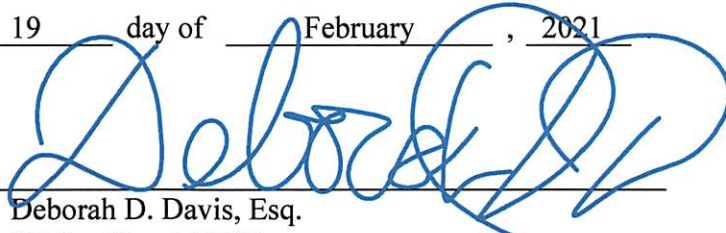
Dear Clerk of Court:

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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ATTORNEYS FOR THE RESPONDENTS

/ddd

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