

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Apr 02 2021

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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 File Out of Time 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.

April 2, 2021

s/Vanessa Cason
Vanessa Cason
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Attorney for Respondent

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PROOF OF SERVICE

I certify that on this April 2, 2021, I have served the Respondent's Motion to File Out of Time and Motion to Proceed Without Payment of 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
April 2, 2021

s/Vanessa Cason
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