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**May 20 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM PICKENS COUNTY  
Court of General Sessions  
Charles B. Simmons, Master in Equity

Appellate Court Case No.: 2020-000396

Terrance "Terry" Carrol,..... Appellant,

v.

Debra Mowery, TD Realty, Upstate RE Group,  
Hawk Shadow Business Services, LLC, and Debra Mower Realtor, ..... Respondents.

MOTION

Appellant hereby moves the Court to allow the electronic filing of the Appellant's Final Brief and Final Reply, and the filing of the bound copy of the Final Reply Brief out of time. Due to oversight the bound printed copy of the Appellant's Final Reply was not sent by U.S. Mail with the Appellant's Final Brief. It further appears that an electronic copies of the Final Brief and Final Reply Brief were not filed or served. That the deficiencies were the result of oversight and counsel was unaware of the deficiencies until receipt of the Court's letter of May 19, 2021.

Wherefore the Appellant moves this Court to allow the correction of the deficiencies and allow the service and filing of the aforementioned documents out of time.

Respectfully submitted,

s/J. Falkner Wilkes

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J. Falkner Wilkes (SC Bar #12893)  
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*Counsel for Appellant*

May 20, 2020.

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CERTIFICATE OF SERVICE

I certify that on May 20, 2021, I served the Appellant's Motion to correct certain deficiencies and allow filing and service of documents out of time on the Respondent by sending a copy of same via email to the AIS email address of counsel of record, and others if indicated, as shown below, and by filing same electronically with the Clerk with a check in the amount of \$50.00 for the filing fee mailed to the Clerk via U.S. Mail:

Luke Anthony Burke  
Bruce Wyche Bannister  
BANNISTER, WYATT & STALVEY, LLC  
PO Box 10007  
Greenville, SC 29603  
via AIS email only to:  
bbannister@bannisterwyatt.com  
astalvey@bannisterwyatt.com

Attorneys for Respondents

and to:

Jenny Abbott Kitchings  
Clerk of the Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

also via email only to: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Respectfully submitted,

s/J. Falkner Wilkes

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May 20, 2021.



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**Jenny Abbott Kitchings, Clerk**  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201



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