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**MOTION TO FILE DESIGNATION OF MATTER AND
FINAL BRIEF OF RESPONDENT OUTSIDE OF FILING DEADLINE**

RECEIVED

JUN 28 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Kenneth A. Campbell, Jr., Special Referee

Appellate Case No. 2019-001886

Patricia E. Campbell

Respondent,

V.

Joanne Ahearn and Robert J. Plum

Appellant.

MOTION TO FILE FINAL BRIEF OF RESPONDENTS OUTSIDE OF FILING DEADLINE

In response to the South Carolina Court of Appeals letter dated June 15, 2021, Respondent, Patricia E. Campbell, is requesting permission to serve and file Final Brief of Respondent outside of the filing deadline.

June 24, 2021



Benjamin C.P. Sapp
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PROOF OF SERVICE TO FILE MOTION UNDER RULES 208 AND 209

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Kenneth A. Campbell, Jr., Special Referee

RECEIVED
JUN 28 2021
SC Court of Appeals

Appellate Case No. 2019-001886

Patricia E. Campbell

Respondent,

V.

Joanne Ahearn and Robert J. Plum

Appellant.

PROOF OF SERVICE TO FILE MOTION UNDER RULES 208 AND 209

I certify that I have served a notice requesting permission from the Appellate Court to file a Motion Requesting Permission to Serve and File the Final Brief of Respondent outside of the filing deadlines as set by Rules 208 and 209 in the 14th Judicial Court in Walterboro, South Carolina on Joanne Ahearn and Robert J. Plum on June 24, 2021 by United States Postal Service.



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Benjamin C. P. Sapp

June 24, 2021

A. Cranwell Boensch
1933-2014

V. Claire Allen
The South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29201

RECEIVED
JUN 28 2021
SC Court of Appeals

Re: Patricia E. Campbell vs. Joanne Ahearn and
Robert J. Plum
Case Number: 2019-CP-15-00285
Our File: 19-93

Dear Ms. Allen:

There is enclosed herewith the Motion to file Final Brief of Respondents Outside of Filing Deadline, Final Brief of Respondent, Proof of Service to File Motion Under Rules 208 and 209 and Certificate of Counsel regarding the above captioned matter along with a check in the amount of \$50.00 for the filing fee. Please return a filed copy of the documents in the envelope provided for that purpose. Do not hesitate to contact me if you have any questions regarding this matter.

With kind regards,

Sincerely,

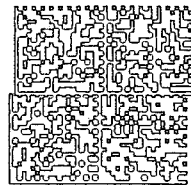


Benjamin C.P. Sapp

BCPS:las

Enclosures: As stated above

Please reference our file number in all correspondence.



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TO:

V. Claire Allen
The South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29201

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