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Sep 03 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Alex Kinlaw, Circuit Court Judge

Case No.: 2020-CP-23-01213
Appellate Case No: 2020-001525

James Earl Tegeler Appellant

v.

Charlotte Collier, Hannah Elizabeth Collier, Linda Smith, Northgate Baptist Church
Respondents

MOTION TO FILE FINAL BRIEF OUT OF TIME

Respondents (“Hannah Elizabeth Collier and Linda Smith”), through its undersigned counsel, would respectfully show unto this Court as follows:

Out of an abundance of caution, Hannah Elizabeth Collier and Linda Smith, submit their motion to file their Final Brief out of time by one (1) day.

Appellant filed and served the Record on Appeal on August 13, 2021, and accordingly, Rule 211 requires each party to serve and final its final brief within 20 days of the filing of the Record on Appeal. The deadline to file the Respondents Final Brief was yesterday, September 2, 2021.

However, the Court issued a deficiency letter to the Appellant on August 17, 2021 because the Record on Appeal violated Rule 267(b). The letter required Appellant to correct the deficiency within 10 days.

Respondents were not notified until yesterday, September 2, 2021 that the Appellant had apparently resolved the deficiency with the Record on Appeal. Respondents are submitting their final brief concurrently with the filing of this motion.

As a result of the foregoing, Respondents, Hannah Collier and Linda Smith, respectfully request to file its Final Brief one (1) day late .

Respectfully submitted,

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s/Daniel R. Hughes

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