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**Jun 01 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable L. Casey Manning, Circuit Court Judge

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Appellate Case No. 2021-00898  
Circuit Court Case No. 2015-CP-40-07268

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Jimmy Helms ..... Respondent

v.

Debbie Willing..... Appellant

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**RESPONDENT’S MOTION TO FILE  
FINAL BRIEF OUT OF TIME**

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Respondent Jimmy Helms respectfully moves before this Court for an Order allowing him to file his Final Brief out of time.

The Respondent’s motion is based on the grounds that on May 31, 2022, counsel for Respondent discovered while reviewing the Appellate Court’s database that the Appellant had filed the Record on Appeal with the Court on April 18, 2022. Respondent’s counsel accessed the Record and finalized the brief which is attached to this motion. Respondent’s counsel was unaware of the filing of the Record and thus had not noted the deadline to file the final brief.

WHEREFORE, the Respondent respectfully requests that he be granted leave to file his Final Brief out of time.

Respectfully submitted,

s/S. Jahue Moore

S. Jahue Moore, SC Bar #4063  
Moore Bradley Myers Law Firm, P.A.  
1700 Sunset Boulevard (29169)  
P.O. Box 5709  
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Attorney for Respondent

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Jimmy Helms, .....Respondent,

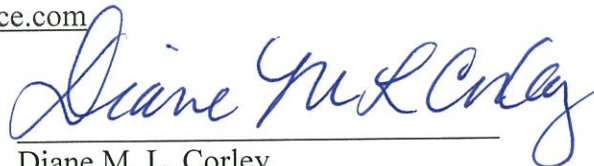
v.

Debbie Willing, .....Appellant.

**PROOF OF SERVICE**

I, Diane M. L. Corley, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the Respondent’s Motion to File Out of Time and Respondent’s Final Brief on the Appellant by depositing a copy of same in the United States Mail, postage prepaid and via electronic mail (email), on June 1, 2022, addressed to their attorney of record as follows:

Ainsley F. Tillman, Esquire  
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Charleston, SC 29403  
[Ainsley.Tillman@FordWallace.com](mailto:Ainsley.Tillman@FordWallace.com)



Diane M. L. Corley  
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 S. Jahue Moore, Jr.  
 William B. Fortino  
 Ralph Nichols Riley, Jr.  
 John C. Bradley, Jr.

June 1, 2022

Melissa K. Moore  
 Lester McGill Bell, Jr.  
 Bryan C. Letteer  
 Sierra D. Carini  
 Lawrence D. Turner  
 Emily E. Collins

*Retired*  
 J. Mark Taylor\*\*  
 Robert D. Hazel†  
 C. David Sawyer, Jr.‡  
 Billy C. Coleman (1916-2019)

The Honorable Jenny Kitchings  
 SC Court of Appeals  
 P.O. Box 11629  
 Columbia, SC 29211  
 Via Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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**SC Court of Appeals**

Re: Jimmy Helms v. Debbie Willing  
 App. Ct. No. 2021-0898

Dear Ms. Kitchings:

We represent Respondent in the above-referenced appeal. We enclose for filing with the Court a Motion to File Out of Time. In addition to the motion, we also enclose a copy of our Final Brief.

We will forward a check for \$50 for the motion fee. Please let us know if anything else is required for the motion to be considered.

Thank you for your time and consideration.

Respectfully,  
 s/S. Jahue Moore  
 S. Jahue Moore

/lgi  
 cc: Ainsley F. Tillman (via email)