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Oct 26 2022

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

Bentley D. Price, Circuit Court Judge

Consolidated Appellate Case No.: 2020-000607

Larry RahnRespondent,

-v-

Barbara SmithAppellant.

RESPONDENT’S MOTION TO FILE INITIAL BRIEF OUT OF TIME

Pursuant to Rule 240 and Rule 263, SCACR, Respondent Larry Rahn respectfully moves this Court for an Order permitting him to file his Initial Brief. The Initial Brief was due to be filed and served October 24, 2022. Respondent respectfully requests permission to file his Initial Brief out of time. This request is being made due to a calendaring and computation error by counsel for Respondent.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

PARKER LAW GROUP, LLP

October 26, 2022
Hampton, South Carolina

By:  _____

Ronnie L. Crosby (SC Bar # 66481)
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Attorneys for Respondent

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PROOF OF SERVICE

The undersigned certifies that a copy of Respondent's Motion to File Initial Brief Out of Time has been served upon the following counsel of record by emailing a copy of the same this 26th day of October 2022.

Thomas Rode, Esq.
THURMOND KIRCHNER & TIMBES, P.A
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PARKER LAW GROUP, LLP

October 26, 2022
Hampton, South Carolina

By:  _____

John E. Parker, Jr.

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SC Court of Appeals

Via Email Only: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

***Re: Larry Rahn v. Barbara Smith
Appellate Case No.: 2020-000607***

Dear Ms. Kitchings:

Please find enclosed for filing Respondent's Motion to File Initial Brief Out of Time, and Proof of Service. In addition, our firm's check in the amount of \$50.00 will go out in today's mail for the filing fee.

By copy of this letter, Respondent's Motion is being served on all counsel of record.

With kind regards, I am

Sincerely,



John E. Parker Jr.

JAY/cc

Enclosures as stated

Cc: Tomas J. Rode, Esq. (Via Email Only)

Gregory E. Parker, Esq. (Via Email Only)