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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable William P. Keesley
Dorchester County
Appellate Case Number 2022-000952

Trial Court Case No.: 2009-CP-18-2200

Rene McMasters, now known as Rene McMasters Ronaghan,.....Respondent,

V.

H. Wayne Charpia and Jody E. Charpia,Defendants,

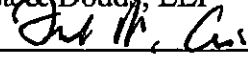
Of Whom H. Wayne Charpia is the.....Appellant.

MOTION REQUESTING PERMISSION TO FILE AND SERVE RESPONDENT’S FINAL
BRIEF OUTSIDE OF THE FILING DEADLINES

The Respondent, Rene McMasters Ronaghan, hereby petitions the Court for an Order granting permission to Respondent’s counsel to serve and file respondent’s Final Brief outside of the filing deadlines set by Rule 211 (SCACR).

The basis for this motion are that the Respondent’s attorney has not been served with the index to the record on appeal or the amended record on appeal and was waiting on service of the index. Respondent’s counsel was not aware that the index and amended record on appeal had been filed by Appellant until October 24, 2022 when Respondent’s counsel reviewed the case file in the South Carolina Case Management System.

Cisa & Dodds, LLP



Frank M. Cisa

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E-mail: frank@cisadodds.com

Attorney for Respondent

This 2nd day of November, 2022

Appellants of Record:

H. Wayne Charpia

106 Axtell Drive

Summerville, SC, 29485

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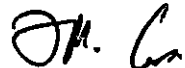
H. Wayne Charpia and Jody E. Charpia,Defendants,

Of Whom H. Wayne Charpia is the.....Appellant.

PROOF OF SERVICE

I certify that I have served a copy of the Respondent’s Final Brief and Motion Requesting Permission to Serve and File Respondent’s Final Brief Outside of the Filing Deadlines, by United States Mail, postage prepaid, on November 2, 2022, addressed to the Appellant, H. Wayne Charpia located at 106 Axtel Drive, Summerville, SC 29485.

Cisa & Dodds, LLP



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Attorney for Respondent

November 2, 2022

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November 2, 2022

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Rene McMasters Ronagham v. H. Wayne Charpia
Case No.: 2009-CP-18-2200
Appellant No.: 2019-001516
Our file: 09-084

Dear Ms. Kitchings:

Enclosed is the original unbound Final Brief of Respondent and one bound paper copy. Also enclosed are six (6) copies of the Respondent's Motion To Serve and File Respondent's Final Brief Outside of the Filing Deadlines together with my Proof of Service and my firm check payable to the Clerk's office in the amount of \$50.00. I would appreciate you filing the originals and returning one (1) filed copy of the Proof of Service to me in the self addressed stamped envelope.

With kindest regards, I am

Very truly yours,



Frank M. Cisa

FMC/alp

Enclosures

cc: H. Wayne Charpia (w/enc.)

CISA & DODDS, LLP
ATTORNEYS AND COUNSELORS AT LAW
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