

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge
H. Steven DeBerry, Circuit Court Judge

Civil Action No.: 2022-CP-26-05492
Appellate Case No.: 2023-001580

Rose Bernard,Appellant,

v.

Lucas Green; Aperture Investigations, Respondents.

RESPONDENTS’ MOTION TO ALLOW LATE FILING OF RESPONDENTS’ FINAL BRIEF

Respondents hereby move this Honorable Court for an order allowing Respondents to file their late filing of Respondents’ Final Reply Brief. This motion is based on impending professional matters, inadvertence and excusable neglect.

Respectfully submitted,

McCUTCHEN VAUGHT GEDDIE &
HUCKS, P.A.

s/Luther O. McCutchen, III
Luther O. McCutchen, III (SC Bar #3763)
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Attorneys for Respondents

April 2, 2024
Myrtle Beach, South Carolina

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PROOF OF SERVICE

The undersigned certifies that he has served Respondent’s Motion to Allow Late Filing of Respondents’ Final Reply Brief, as well as a copy of Respondents’ Rule 211(b) certification, upon Rose Bernard, pro se Appellant, via email to b4ornot@gmail.com, this 2nd day of April, 2024, pursuant to Rule 262 and the South Carolina Supreme Court’s Order as amended May 6, 2022.

McCUTCHEN VAUGHT GEDDIE &
HUCKS, P.A.

s/ Luther O. McCutchen, III

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Attorney for Respondent

Rose Bernard v. Lucas Green (2023-001580)

From: jgr@lawyersatthebeach.com

Sent: Tue, Apr 2, 2024 at 4:55 pm

To: Rose Bernard

Cc: Luther McCutchen

[Respondent's Motion to Allow Late filing of RFB.pdf \(87.4 KB\)](#)

[Respondent's 211\(b\) certification.pdf \(84.7 KB\)](#)

– [Download all](#)

Ms. Bernard:

Attached hereto and served upon you are the following:

- 1) Respondents' Motion to Allow Late Filing of Respondents' Final Reply Brief; and
- 2) Respondents' Rule 211(b) Certification.

Jennifer G. Reynolds

Legal Assistant

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