

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**Aug 12 2024**

**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
The Hon. Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2023-000718

DARLEEN RASH, Individually and as Personal Representative  
for the ESTATE OF BRONSON HARLEY RASH .....Appellant-Respondent,

v.

DOMINION ENERGY (formerly SOUTH CAROLINA  
ELECTRIC & GAS COMPANY); ANTHONY M. AKBAR;  
AND PAUL QUATTLEBAUM, ..... Respondents-Appellants.

**APPELLANT-RESPONDENT DARLEEN RASH'S MOTION TO SERVE  
AND FILE INITIAL BRIEF OUTSIDE OF TIME**

Appellant-Respondent Darleen Rash, by and through undersigned counsel, hereby moves the Court for an order permitting Rash to file and serve her Initial Reply Brief in the principal appeal and her Initial Brief as Respondent in the cross-appeal. On May 13, 2024, the parties jointly moved for an extension of time to file Initial Reply Briefs as Appellant and accompanying Designations of Matter until June 7, 2024. On May 21, 2024, Respondent-Appellants filed a motion to strike Appellant-Respondent's Brief as Respondent and to stay all deadlines until this Court ruled on that motion. On June 4, the parties filed a second joint motion for an extension of time to file Initial Reply Briefs until June 27, 2024, and to stay the deadlines for filing reply briefs until the Court ruled on the motion to strike.

On June 6, the clerk’s office informed the parties that the appeal would be held in abeyance pending a resolution on the motion to strike and that the “appropriate timelines will be set after the Court issues a decision on the motion to strike.” Because the entire appeal was held in abeyance, the time to file Appellant-Respondent’s Initial Reply Brief was stayed. This changed on July 9, 2024, when the Court issued an order directing Appellant-Respondent to file an amended brief within twenty days. After that time expired, the clerk’s office then informed Appellant-Respondent that she must file a motion to file outside of time with her brief for it to be considered by the Court.

Appellant-Respondent acknowledges the error in oversight in complying with the Court’s directive to file and serve her initial briefs within twenty days of the July 9, 2024 Order. This mistake was made in good-faith, and permitting Appellant-Respondent to file both her Initial Reply Brief and Initial Brief as Respondent in the cross-appeal does not prejudice Respondent-Appellants. Ultimately, Appellant-Respondent requests the Court grant this Motion in order for the Court to consider all briefing in deciding this complex appeal.

Respectfully submitted,

**POULIN | WILLEY | ANASTOPOULO, LLC**

*s/Roy T. Willey, IV*

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August 12, 2024  
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