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Jan 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2024-000922
Case No. 2023-CP-40-02377

Anthony R. Taylor,

Appellant,

v.

The State of South Carolina Office of Attorney General Alan Wilson, Honorable Frank R. Addy,
and Attorney Jacqueline Marie Pavlicek¹,

Of which Attorney Jacqueline Marie Pavlicek is the respondent,

Respondent.

**RESPONDENT JACQUELINE MARIE PAVLICEK'S MOTION TO SERVE AND FILE
HER INITIAL BRIEF AND DESIGNATION OF MATTER OUT OF TIME**

According to the court filings, the Appellant filed his Initial Brief on November 8, 2024 and the Designation of Matter on November 21, 2024. The Appellant had delivered many papers to the office of the undersigned attorney, who was unaware of the filings of these matters. In fact, the undersigned was waiting for on the Designation of Matter before responding with the Respondent's Initial Brief.

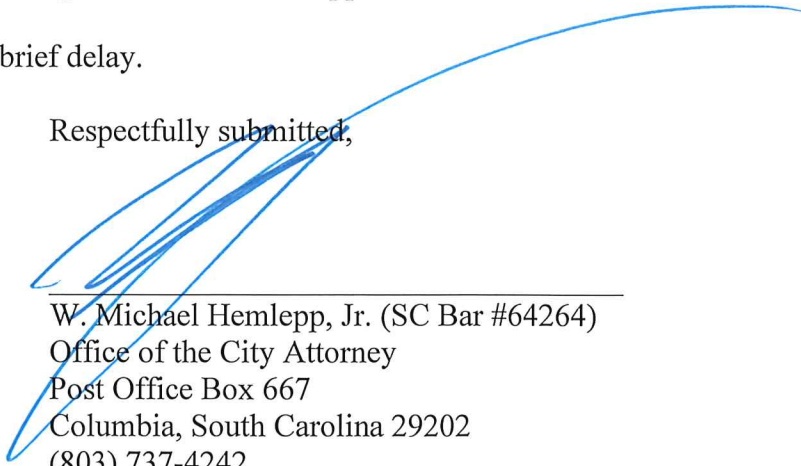
¹ Respondents Attorney General Alan Wilson and the Honorable Frank R. Addy have been dismissed by order of the Court on August 29, 2024.

Respondent Pavlicek was, at all times in this case, an employee of the City of Columbia in the City Attorney's Office. She is now a lawyer in private practice in the Columbia Area. From time to time, Mr. Taylor "serves" her by showing up to her office and dropping off papers, which he does at regular intervals. Some of these are relevant and some are not. The Initial Brief and Designation of Matter, if dropped off at all, was not recognized as such.

On January 15, 2025, the undersigned was informed the initial brief Respondent Jacqueline Marie Pavlicek's Initial Brief and Designation of Matter were delinquent by letter of Catherine Harrison of the Clerk's Office of the South Carolina Court of Appeals. The Respondent Pavlicek hereby requests leave to brief outside of the time due to the confusion of service created by the Appellant.

The undersigned has not contacted the *pro se* Appellant to consult regarding this request to allow Respondent Pavlicek's Initial Brief and Designation to be filed out of time. Respondent Jacqueline Marie Pavlicek, by and through its attorney, hereby requests the Court accept the filing of its Initial Brief and Designation of Matter on February 28, 2025, as permissible under the circumstances. Appellant believes the delay to be minimal in impact to the proceedings as the Court has not yet set this matter for a hearing and neither the Appellant nor the other Respondents have suffered any prejudice by the brief delay.

Respectfully submitted,



W. Michael Hemlepp, Jr. (SC Bar #64264)
Office of the City Attorney
Post Office Box 667
Columbia, South Carolina 29202
(803) 737-4242
Attorney for Respondent Jacqueline Marie Pavlicek

January 21, 2025

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge
G. Thomas Cooper, Circuit Court Judge

Appellate Case No. 2018-000948
Case No. 2015-CP-40-05598

Anthony Taylor,

Appellant,

v.

The State of South Carolina Attorney General Alan Wilson, The Honorable Frank Addy, and
Attorney Jacqueline Marie Pavlicek,

Of whom Attorney Jacqueline Marie Pavlicek is the Respondent,

Respondent.

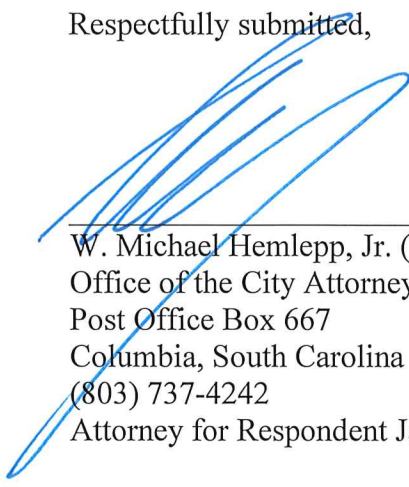
PROOF OF SERVICE

I certify that I have served *Respondent Jacqueline Marie Pavlicek's Motion to File Initial Brief and Designation of Matter Out of Time* upon the Appellant by depositing copies of them in the United States Mail, postage prepaid to them at their addresses shown below on this 21st day of January, 2025:

**ANTHONY TAYLOR
1549 Lilly Avenue
Columbia, South Carolina 29204**

****SIGNATURE ON NEXT PAGE****

Respectfully submitted,



W. Michael Hemlepp, Jr. (SC Bar #64264)
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January 21, 2025

Columbia, South Carolina