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Jul 15 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Marvin H. Dukes, III

Case No. 2017-CP-07-02110
Appellate Case No. 2024-001053

Charles Willis Gardner,.....Respondent,

v.

Taylor Reuben Adams, and Beaufort County, South Carolina, Defendants,
of which Taylor Reuben Adams is the.....Appellant,

AND

Beaufort County, South Carolina is a.....Respondent.

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

The Respondents, Mr. Charles Willis Gardner, by and through his undersigned counsel, hereby moves the Court to file his Final Brief to be included in the Record on Appeal despite the fact that the Appellant, Taylor Reuben Adams, has yet to submit the Amended Record on Appeal as required by the most recent Order in this case.

Counsel requests that all timelines be held in abeyance while the Court considers this request.

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Mt. Pleasant, South Carolina
July 15, 2025

BUIST BYARS & TAYLOR, LLC



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v.

Taylor Reuben Adams, and Beaufort County, South Carolina, Defendants,
of which Taylor Reuben Adams is the.....Appellant,

AND

Beaufort County, South Carolina is a.....Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent’s, Mr. Charles Willis Gardner, (the “Respondent”), Motion Requesting Permission to serve and file the Final Brief outside of the filing deadline and the Respondent’s Final Brief by depositing a copy of same Via Email to all counsel at tfinger@Fingerlaw.com, RAchurch@hgpa.com, and NAkers@hgpa.com.

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July 15, 2025

VIA EMAIL: ctappfilings@sccourts.org
AND VIA US MAIL
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

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SC Court of Appeals

*RE: Charles Willis Gardner v Taylor Reuben Adams et al.,
C/A No.: 2017-CP-07-02110 Appellate Case No. 2024-001053
Client File No.: 9961.0001*

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the Respondent's, Charles Willis Gardner, Motion Requesting Permission to serve and file the Final Brief outside of the filing deadline, Final Brief and Proof of Service in the above-referenced matter along with the filing fee in the amount of \$50.00.

We are submitting this since they are due despite the fact that the Appellant, Taylor Reuben Adams, has yet to submit the Amended Record on Appeal as required by the most recent Order in this case.

By copy of this letter, I am serving same upon all counsel. Should you have any questions, please feel free to contact me.

With kindest regards, I remain

Yours very truly,

A handwritten signature in blue ink, appearing to read 'G. Hamlin O'Kelley, III'. The signature is stylized and fluid.

G. Hamlin O'Kelley, III

GHOIII/atd
Enclosures (Via Email Only)

Terry A. Finger, Esq. tfinger@fingerlaw.com
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Nathan E. Akers, Esq. NAkers@ghhpa.com