

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas**

Marvin H. Dukes, III, Master in Equity

**CIRCUIT COURT CASE NO. 2011-CP-07-04722
APPEAL CASE NO. 2013-001101**

CITY OF BEAUFORT Respondent

v.

JOSEPH C. SUN Appellant

**MOTION TO FILE RECORD ON APPEAL
AND FINAL BRIEF OUT OF TIME**

Appellant is appearing pro se in this case without the benefit of counsel. He has limited access to legal reference and means to prepare legal documents. Appellant only has a copy of an out of date South Carolina Appellate Court Rules which is not current and has overlooked certain filing dates and requirements of documents on appeal. Appellant has done the best he can to complete all required papers to be filed in this case some of which may be late.


Wherefore, Appellant prays the court to grant him leave to file his Final Brief and Record on Appeal out of time.

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This 28th day of October, 2013.

Respectfully submitted,

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JOSEPH C. SUN, pro se
P. O. Box 151
Bluffton, SC 29910
843-227-0963

PROOF OF SERVICE

I certify that I have this date served the Respondent City of Beaufort a copy of the Appellant's Motion to File Record on Appeal and Final Brief Out of Time by depositing a copy of same in the United States Mail, postage prepaid on October 28, 2013 to the following addresses:

William B. Harvey, III
P. O. Drawer 1107
Beaufort, SC 29901-1107
Attorney for Respondent
843-524-3109

This 28th day of October, 2013,



JOSEPH C. SUN, pro se
P. O. Box 151
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