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S.C. Supreme Court

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable John M. Milling, Circuit Court Judge

Civil Action No.: 2007-CP-10-896
Appellate Case No.: 2011-188006

Ira Banks, James Bell and
Vernon Holmes,

Respondents,

v.

St. Matthew Baptist Church
and Clinton Brantley of whom
Clinton Brantley is the

Petitioner.

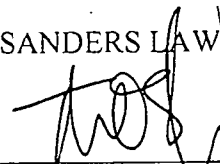
MOTION TO FILE OUTSIDE OF TIME

Pursuant to Rules 222 and 240, SCRAP, Respondents Ira Banks, James Bell and Vernon Holmes ("Respondents") move for their December 28, 2013 *Motion for Costs* to be filed outside of the required time of 15 days.

Respondents' attorney was unable to file the *Motion for Costs* by December 15, 2013, because he is a sole practitioner with a heavy court schedule and with all the administrative responsibilities of operating his law practice, and because December 15, 2013 fell during the Christmas Season Rush, which delayed the filing of this motion until January 2, 2014.

Respondents' *Motion for Costs* should be considered outside of the required time, because it would be inequitable not to do so, given that Respondents' attorney achieved favorable results in both the Court of Appeals and in the Supreme Court.

SANDERS LAW FIRM, LLC



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ATTORNEY FOR RESPONDENTS

JAN. 4, 2014
Charleston, South Carolina

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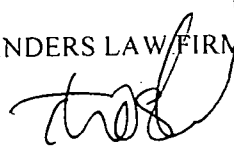
PROOF OF SERVICE

I certify that I have served the *Motion to File Outside of Time* on Petitioner Clinton Brantley and upon St. Matthew Baptist Church by depositing a copy of it in the United States Mail, postage prepaid, on January 4, 2014, addressed to all attorneys of record:

Weston Adams, III, Esquire
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Attorney for Petitioner Clinton Brantley

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