

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

71229

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

Rivers Lawton McIntosh, Circuit Court Judge

Alexander S. Macaulay, Circuit Court Judge and Trial Judge

Civil Action No.: 2005-CP-37-00788  
Appellate Case No.: 2011-2020946

Tri-County Development, Inc. and Melinda  
Holbrooks,..... Respondents.

v.

Christopher A. Pierce,..... Appellant.

Christopher A. Pierce,..... Third-Party Plaintiff,

v.

Jeff Gray,..... Third-Party Defendant.

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FEB 07 2014

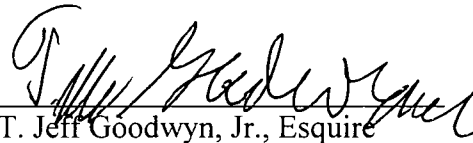
SC Court of Appeals

APPELLANT'S MOTION TO FILE FINAL BRIEF  
AND FINAL REPLY BRIEF OUT OF TIME

Appellant hereby moves for to file its Final Brief and Final Reply Brief out of time. The initial due date was November 14, 2013. Appellant filed a Motion to Supplement the Record on Appeal with the Court on November 14, 2014 and believed the Court would extend the filing of the Final Briefs in this case and notify the parties of same. Appellant was informed today by the court that the motion to supplement the record would not extend the filing deadline. The brief

has been ready to be filed since prior to November 14, 2013 apologizes for the misunderstanding as to the due dates.

Respectfully submitted,



T. Jeff Goodwyn, Jr., Esquire

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Attorneys for Appellant

February 7, 2014

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Court of Common Pleas

Alexander S. Macaulay, Circuit Court Judge

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Civil Action No.: 2005-CP-37-00788  
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Jeff Gray,.....Third-Party Defendant.

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**PROOF OF SERVICE**

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I certify that I have served the Appellant's Motion to File Final Brief and Final Reply Brief out of Time on Thomas E. Dudley, III, Esquire, Counsel for the Respondents at Kenison, Dudley & Crawford, LLC 704 East McBee Avenue, Greenville, SC 29601 by depositing a copy of same in the United States Mail, postage prepaid, on February 7, 2014.

GOODWYN LAW FIRM, LLC



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Attorneys for Appellant

February 7, 2014

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**SC Court of Appeals**

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February 7, 2014

## VIA HAND DELIVERY

Jenny Abbott Kitchings, Clerk of Court  
The South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

RE: *Tri-County Development, and Melinda Holbrooks v. Christopher A. Pierce;  
Christopher A. Pierce, Third-Party Plaintiff v. Jeff Gray, Third-Party  
Defendant*  
*Civil Action No.: 2005-CP-37-00788*  
*Case No.: 2011202946*  
*Our File No.: 3500-0014*

Dear Ms. Kitchings:

Enclosed please find an original and one copy of Appellant's Motion to File Final Brief and Final Reply Brief out of Time along with a check in the amount of \$25.00 representing the filing fee for filing in regard to the above referenced matter. Please return a filed copy of same with the courier.

By copy of this letter and as evidence on the attached Proof of Service, I am serving a copy of same upon Thomas E. Dudley, III, Esquire, counsel for the Respondents.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures  
cc: Thomas E. Dudley, III, Esquire  
Chris Pierce

**RECEIVED**

FEB 07 2014

**SC Court of Appeals**