

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
COURT OF Common Pleas

Mikell R. Scarborough  
MASTER-IN-EQUITY

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Case No. 2013-002108

Essie B. Bryan, Appellant,

v.

Charleston County and C.A. Roberds, Respondents,

v.

C.A. Roberds, Respondents,

v.

Ernest Kinloch d/b/a Ernie's Restaurant, Third Party Defendant

**RECEIVED**

MAR 21 2014

**SC Court of Appeals**

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MOTION TO ALLOW LATE FILING

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The Appellant moves before this Honorable Court for an Order to allow the late filing of the Initial Brief on the grounds that the attorney for the Appellant was engaged in a heavy trial schedule and needs an additional thirty (30) days to file the Initial Brief of Appellant.

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A handwritten signature in black ink, reading "Robert L. Gailliard". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Robert L. Gailliard, Esquire  
1072 King Street, Suite E  
Charleston, SC 29403  
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rlgailliardlaw@aol.com

March 18, 2014

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PROOF OF SERVICE

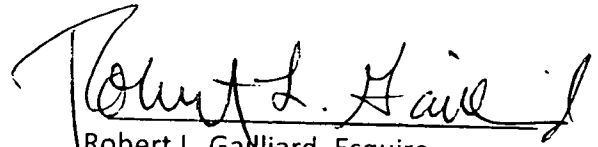
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I certify that I have served the Motion to allow late filing of the Initial Brief and Designation of Matter on Charleston County and C.A. Roberds by depositing a copy of it in the United States Mail, postage prepaid, on March 18, 2014, addressed to their Attorneys of Record, Joseph Dawson III, 4045 Bridgeview Drive, North Charleston, SC 29405 and Kerry Koon, Wappoo Center, 147 Wappoo Creek Drive, Suite 203, Charleston, SC 29412.

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March 18, 2014

**ROBERT L. GAILLIARD  
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March 18, 2014

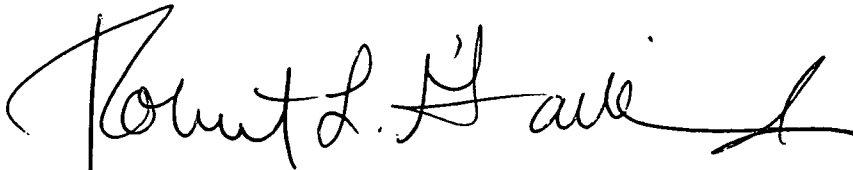
Ms. Jenny Abbott Kitchings, Clerk  
SC Court of Appeals  
P.O Box 11629  
Columbia, SC 29211

Re: Essie Bryan v. Charleston County  
Appellate Case No.: 2013-002108

Dear Madame Clerk:

Enclosed please find my Motion to Allow the Late Filing and the Proof of Service showing service of the Motion on all attorneys of record. I have enclosed six (6) copies of the Motion along with my check for twenty five dollars (\$25.00) to file the Motion.

Sincerely,



Robert L. Gailliard

Copy: Joseph Dawson III, Esquire  
Kerry W. Koon, Esquire

Enclosure as stated

**RECEIVED**

MAR 21 2014

**SC Court of Appeals**