

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

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MAR 17 2014

George C. James, Jr., Circuit Court Judge **SC Court of Appeals**

M1598

Appellate Case No. 2013-000022
Case No. 2011-CP-36-00588

Danny Abrams and Frances Abrams,Appellants,

v.

City of Newberry,Respondent,

**APPELLANTS' MOTION TO FILE
APPELLANTS' INITIAL REPLY BRIEF
OUT OF TIME**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT
APPEALS:

Appellants respectfully move this Court for an Order granting them
leave to file Appellants' Initial Reply Brief out of time.

Counsel for Appellants represent to this Court that they have been
conscientious in his efforts to prepare Appellants' Initial Reply Brief;
however, because of the inclement weather experienced in our area in

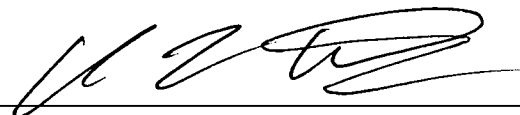
February, as well as a multitude of deadlines in numerous complex matters. Appellants were unable to meet the original filing deadline. In the interest of not extending the time for briefing via a motion for extension, Appellants elected to take this procedural route to complete their briefing.

Appellants represent to this Court that counsel for Appellants consulted with counsel for Respondent regarding this motion and that counsel graciously provided his consent.

Appellants greatly appreciate the Court's time, attention, and assistance with regard to this request for leave to file Appellants' Initial Reply Brief out of time.

Respectfully submitted,
COLLINS & LACY, P.C.

By:



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ATTORNEYS FOR APPELLANTS

Columbia, South Carolina
March 17, 2014

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PROOF OF SERVICE

I hereby certify that I served Appellants' Motion for Leave to File Appellants' Initial Reply Brief Out of Time upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on March 17, 2014, addressed to the following:

COUNSEL SERVED:

David L. Morrison, Esquire

Morrison Law Firm


7453 Irmo Drive, Suite B

Columbia, SC 29212

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,
COLLINS & LACY, P.C.

By:



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ATTORNEYS FOR APPELLANTS

**PROOF OF SERVICE –
APPELLANTS’ MOTION FOR
LEAVE TO FILE APPELLANTS’
INITIAL REPLY BRIEF OUT
OF TIME**

Columbia, South Carolina
March 17, 2014