

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2010-CP-23-1646

**RECEIVED**

JUL 28 2014

**SC Court of Appeals**

173022

Kyle Pertuis, ..... Respondent/Appellant,

v.

Front Roe Restaurants, Inc., Beachfront  
Foods, Inc., Lake Point Restaurants, Inc.,  
Mark Hammond and Larkin Hammond, ..... Appellants/Respondents.

**APPELLANTS/RESPONDENTS JOINT MOTION  
TO EXCEED PAGE LIMITATIONS**

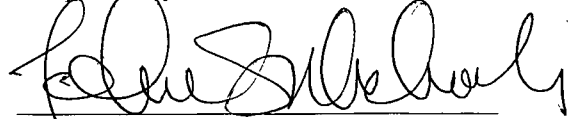
Pursuant to Rules 208(b)(5) and 240, SCACR, Appellants/Respondents hereby moves this Court to grant leave to permit Appellants/Respondents to exceed the page limitations set forth in Rule 208(b)(5) for the Initial Brief of Appellant. Counsel for Appellants/Respondents has been working diligently to complete the brief within the limitations, but because of the extent of this case Appellants/Respondents request the Court grant leave to exceed those page limitations.

Appellants/Respondents request that the Court accept the filing of the Joint Initial Brief of Appellants although it exceeds the page limitations set forth in Rule 208(b)(5). Appellants/Respondents have attached the documents to the Motion, and requests that the

Court conditionally file these documents this date pending a ruling on this Motion.

July 28, 2014

Respectfully submitted,



John S. Nichols, SC Bar # 4210

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*Attorney for Appellants/Respondents  
Front Roe Restaurants, Inc., Beachfront  
Foods, Inc., Lake Point Restaurants, Inc.*

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Kyle Pertuis, ..... Respondent/Appellant,

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Mark Hammond and Larkin Hammond, ..... Appellants/Respondents.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent/Appellant with a copy of the *Motion for the Court to Accept the Appellants/Respondents Joint Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal Out of Time, Motion to Exceed the Page Limitations*, and the conditionally filed *Joint Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Robert C. Wilson, Jr., Esquire  
201 Whitsett St.  
Greenville, SC 29601

**RECEIVED**

JUL 28 2014

**SC Court of Appeals**

July 28, 2014

*Erin Bridges*

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Erin Bridges  
BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

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Ashley Trout Thompson  
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Kenneth Henry Dojaquez  
John Clarke Newton

OF COUNSEL  
O. Eugene Powell, Jr.

July 28, 2014

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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JUL 28 2014

**SC Court of Appeals**

RE: Kyle Pertuis v. Front Roe Restaurants, Inc.  
Case Tracking No.: 2013-002257

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a Joint Motion for the Court to Accept the Joint Brief of Appellants and Designation of Matter to be Included in the Record on Appeal Out of Time. I have also enclosed for filing the original and seven (7) copies of a Joint Motion to Exceed Page Limitations in reference to the above matter.

Also please find enclosed the conditionally filed original and one (1) copy of the Joint Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal. I have also enclosed a proof of service upon counsel for the Respondent/Appellant and a \$100.00 check for filing these motions. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to John S. Nichols

BLUESTEIN, NICHOLS,

THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Curtis W. Stodghill, Esquire  
Robert C. Wilson, Jr., Esquire