

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

OCT 10 2014

SC Court of Appeals

APPEAL FROM LANCASTER COUNTY
COURT OF COMMON PLEAS

William C. Tindal, Special Referee

Appellate Case No. 2013-002370

Ned Gregory, Jr., Respondent,

v.

Howell Jackson Gregory, The Gregory Company, Inc.,
and the City of Lancaster, Defendants,

Of whom Howell Jackson Gregory and
The Gregory Company, Inc., are the Appellants.

RESPONDENT'S REPLY TO
MOTION TO DISALLOW

Respondent replies to appellants' motion to disallow, as follows:

1. According to their certificate of service, the appellants served a copy of a defective Record on Appeal on August 22, 2014. (In his letter of August 27, 2014, attached to the motion to disallow, Mr. Irvin stated that the date of service was not the 22d but the 21st.) The undersigned did not receive this mailing, perhaps because the zip code of the address recited in the certificate of service was wrong.

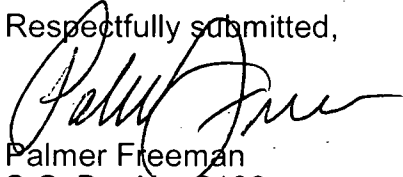
2. The defective Record omitted three designated items. Mr. Irvin mailed copies of those three items to the undersigned on August 27th. The undersigned awaited service of a corrected Record on Appeal.

3. The appellants served a copy of a corrected Record on Appeal on September 9, 2014. The undersigned received this mailing in due course and accordingly diaried the due-date for respondent's final brief as September 29, 2014. The final brief

was served and filed on September 23, 2014.

4. The appellants are correct that the name of one of the two appellants was inadvertently omitted from the caption on the cover page of respondent's final brief. The undersigned's legal assistant is prepared to correct this error at the convenience of the Clerk of Court with appropriate labels. Alternatively, the respondent will re-print and re-file his final brief, as the Court may desire.

Respectfully submitted,



Palmer Freeman
S.C. Bar No. 2132
Post Office Box 8024
Columbia, South Carolina 29202
(803) 799-9400

October 10, 2014.

Attorney for Respondent.

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

OCT 10 2014

APPEAL FROM LANCASTER COUNTY
COURT OF COMMON PLEAS

SC Court of Appeals

William C. Tindal, Special Referee

Appellate Case No. 2013-002370

Ned Gregory, Jr., Respondent,

v.

Howell Jackson Gregory, The Gregory Company, Inc.,
and the City of Lancaster, Defendants,

Of whom Howell Jackson Gregory and
The Gregory Company, Inc., are the Appellants.

CERTIFICATE OF SERVICE

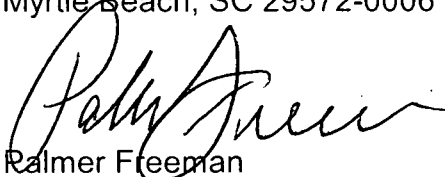
I certify that I served a copy of Respondent's Reply to Motion to Disallow upon the appellant The Gregory Company, Inc., by first class mail, postage prepaid, addressed to its attorney at his address of record, namely:

James T. Irvin, Jr.
Irvin Law Firm, LLC
P. O. Box 2677
Myrtle Beach, SC 29578

and upon appellant Howell Jackson Gregory at his address of record, namely:

Howell Jackson Gregory
P. O. Box 7111
Myrtle Beach, SC 29572-0006

on October 10, 2014.



Palmer Freeman
S.C. Bar No. 2132
Post Office Box 8024
Columbia, South Carolina 29202
(803) 799-9400

October 10, 2014.

Attorney for Respondent.

**PALMER FREEMAN
ATTORNEY
POST OFFICE BOX 8024
COLUMBIA, SC 29202**

TEL. 803 799 9400
FAX 803 376 5084
EMAIL: PALMERFREE@MSN.COM

RECEIVED
OCT 10 2014
SC Court of Appeals

October 10, 2014

HAND-DELIVERED

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1205 Pendleton Street
Columbia, South Carolina 29201

Re: Ned Gregory, Jr. vs. Howell Jackson Gregory and The Gregory Company, Inc.
Appellate Case No. 2013-002370

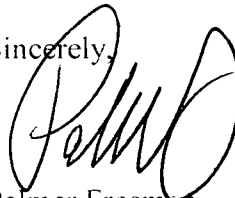
Dear Ms. Kitchings:

Please find enclosed for filing the unbound original and six (6) copies of Respondent's Reply to Motion to Disallow. Also enclosed for filing is the Certificate of Service.

Thank you for your assistance in this matter. Should the Court have questions or require anything further, please contact me.

With best regards, I am,

Sincerely,



Palmer Freeman

PF/cbd

Enclosures

cc Ned Gregory
H. Jackson Gregory
James T. Irvin, Esquire