

**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

**APPEAL FROM BEAUFORT COUNTY
Circuit Court
Marvin Dukes, Jr.
Master-in-Equity**

**Unpublished Opinion No 2014-UP-203 (S.C. Ct. App. Filed May 28, 2014)
Appellate Case No. 2014-002095**

**Helena P. Tirone and Truman's Eclectic Irish Pub, Inc. Respondents,
v.
Thomas W. Dailey Petitioner.**

MOTION FOR LEAVE TO FILE REPLY OUT OF TIME

**André DuBose Rembert
P.O. Box 20341
Charleston, SC 29413
andrerembert@gmail.com
843-518-3232**

Attorney for Petitioner


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NOV 19 2014
S.C. SUPREME COURT

MOTION FOR LEAVE TO FILE REPLY OUT OF TIME

Petitioner, pursuant to Rules 240 & 263(b), SCACR, moves this Court for leave to file his Reply out of time. The Petitioner would show the following in support of his motion:

Due to an administrative error, the Reply in this matter was filed two days late. A delay of this length cannot conceivably prejudice any party, and Petitioner moves this court to accept his Reply out of time.

Wherefore, the Petitioner asks this Court for leave to file his Reply out of time for the Court's consideration and grant any such other relief this Court deems just and proper.



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Attorney for Petitioner

November 17th, 2014

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PROOF OF SERVICE

I, André Rembert, attorney for the Petitioner, certify that I have served opposing counsel in this action by serving a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by U.S. Mail to the following on the date listed below:

Pleadings: MOTION FOR LEAVE TO FILE REPLY OUT OF TIME

**Party Served: J. Ashley Twombly
twombly@wtlawfirm.com
TWENGE + TWOMBLY LAW FIRM
311 Carteret Street
Beaufort, SC 29902**



André DuBose Rembert, Esq
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843-518-3232

Attorney for Petitioner

Dated: November 17, 2014



The Supreme Court of South Carolina

Rembert

11/19/2014

RECEIPT #74198

Case No: 2014-002095
Case Short Title: Helena P. Tirone v. Thomas Dailey
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Money Order
Reference No: 22262630103
Check/Money Order Date: 11/17/2014
Comments: