

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Frank R. Addy, Jr., Circuit Court Judge

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Case No. 2012-CP-32-3208

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**RECEIVED**

MAR 04 2015

**SC Court of Appeals**

75245

Raymond Carter, ..... Appellant,

v.

Donnie Myers, Solicitor, Lexington County; Tracey Carroll,  
Assistant Solicitor, Lexington County; Brian Buck, Irmo  
Police Department; Scott Franklin, Irmo Police Department;  
Timothy E. Stephenson, South Carolina Law Enforcement (SLED);  
George White, Ex father-in-law; Tammy Carter, (AKA Tammy Scrogam),  
Ex-wife; Barbara Keadle (AKA Diane Hinkle) Investigator LDSS;  
Francis Ross, LDSS; Paulette Jolly, Guardian ad Litem, in their  
official and individual capacities, ..... Defendants,

Of whom, Brian Buck, Irmo Police Department and Scott Franklin,  
Irmo Police Department, are, ..... Respondents.

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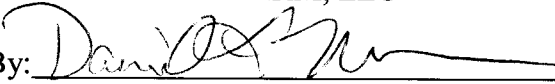
**RESPONDENTS BRIAN BUCK AND SCOTT FRANKLIN'S MOTION TO FILE FINAL  
BRIEF OUT OF TIME**

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The Respondents Brian Buck and Scott Franklin file this motion to be allowed to file their Final Brief out of time. After several attempts and motions to correct, the Appellant finally served a corrected Record on Appeal on January 28, 2015. The Final Brief of these Respondents was then originally due on or before February 17, 2015. Counsel for these Respondents did not properly diary the due date for the Final Brief after having received several attempts at filing a correct Record on Appeal. Counsel is now filing a Final Brief with this motion. These

Respondents respectfully request an extension of time so this Final Brief can be filed out of time, received and considered.

MORRISON LAW FIRM, LLC

By: 

David L. Morrison, Esquire

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ATTORNEY FOR THE RESPONDENTS  
BRIAN BUCK AND SCOTT FRANKLIN

Columbia, South Carolina

March 3, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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MAR 04 2015

**SC Court of Appeals**

APPEAL FROM LEXINGTON COUNTY  
Frank R. Addy, Jr., Circuit Court Judge

Case No. 2012-CP-32-3208

Raymond Carter, ..... Appellant,

v.

Donnie Myers, Solicitor, Lexington County; Tracey Carroll,  
Assistant Solicitor, Lexington County; Brian Buck, Irmo  
Police Department; Scott Franklin, Irmo Police Department;  
Timothy E. Stephenson, South Carolina Law Enforcement (SLED);  
George White, Ex father-in-law; Tammy Carter, (AKA Tammy Scrogam),  
Ex-wife; Barbara Keadle (AKA Diane Hinkle) Investigator LDSS;  
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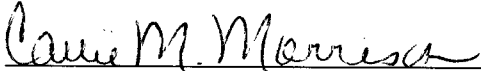
Of whom, Brian Buck, Irmo Police Department and Scott Franklin,  
Irmo Police Department, are, ..... Respondents.

**CERTIFICATE OF SERVICE**

The undersigned employee of Morrison Law Firm, LLC, attorney for the Defendants, Chief Brian Buck and Scott Franklin, does hereby certify that service of the **Motion to File Final Brief Out Of Time** in the above-captioned action was made upon Plaintiff and all counsel of record by placing same in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 4th day of March, 2015, addressed as follows:

Mr. Raymond W. Carter  
2219 Leesburg Road  
Columbia, SC 29209

Andrew F. Lindemann, Esquire  
Post Office Box 8568  
Columbia, SC 29202

  
\_\_\_\_\_  
Callie M. Morrison

Columbia, South Carolina

**Morrison Law Firm, LLC**

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E-mail: Kassi@dmorrison-law.com

David L. Morrison\*  
Kassi B. Sandifer

\*Licensed in SC & NC  
\*Certified Mediator

March 4, 2015

**Hand Delivered**

Honorable Jenny Abbott Kitchings  
Court of Appeals, Clerk of Court  
1205 Pendleton Street (Edgar Brown Building)  
Columbia, South Carolina 29201


RE: Raymond W. Carter v. Donnie Myers, Solicitor Lexington County, Tracey Carroll,  
Assistant Solicitor Lexington County, Brian Buck of Irmo Police Dept, et al.  
C/A #: 12-CP-32-03208  
Date of Original Polygraph & Confession: October 25, 1999  
Date of Original Guilty Plea: May 13, 2003  
Claim #: SF-12-0794  
Our file: 210.0379

Dear Clerk Kitchings:

Enclosed for filing is the original and one copy of the Motion to File Final Brief Out of Time for Respondents Brian Buck and Scott Franklin in this matter. By copy of this letter, we are serving the Appellant with a copy of same.

Very truly yours,

MORRISON LAW FIRM, LLC

  
David L. Morrison

DLM/cmm

Enclosure

cc: Raymond Carter  
Andrew F. Lindemann, Esquire

**RECEIVED**

MAR 04 2015

**SC Court of Appeals**