

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

APR 30 2015

R. Markley Dennis, Jr., Circuit Court Judge

SC Court of Appeals

Case No.: 2014-002575

ROOSEVELT SIMMONS,Appellant,

v.

MASE and COMPANY, LLC,
J. AL CANNON, JR., CHARLESTON
COUNTY SHERIFF'S DEPT.,
CHARLESTON COUNTY REVENUE
COLLECTIONS DEPT., and HARRY LONG,.....Respondents.

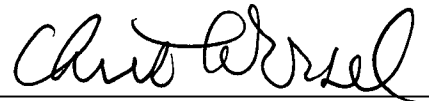
**J. AL CANNON, JR., CHARLESTON COUNTY SHERIFF'S DEPT.,
CHARLESTON COUNTY REVENUE COLLECTIONS DEPT., and
HARRY LONG'S MOTION UNDER RULE 208(b)(5), SCACR,
TO EXCEED LENGTH OF BRIEF**

Respondents J. Al Cannon, Jr., Charleston County Sheriff's Dept., Charleston County Revenue Collections Dept., and Harry Long (hereinafter, "Respondents") file this motion pursuant to Rule 208(b)(5) of the South Carolina Appellate Court Rules respectfully requesting the Court's permission to file a brief that will exceed the fifty (50) page limit provided by the Appellate Court Rules. As grounds for this motion, Respondents would show that this case involves complex claims and issues, which necessitated Appellant's filing of a lengthy initial brief with multiple issues on appeal. In order to adequately respond to Appellant's initial brief and to adequately address the

complex issues in this case, the brief of the Respondent required additional pages (approximately five (5) pages). Respondents would respectfully submit that it would be in the interests of justice to allow the additional pages so that Respondents can fully address the matters herein.

For that reason, Appellants respectfully request that they be allowed to exceed the allowable page limit for initial briefs.

Respectfully submitted,



CHRISTOPHER T. DORSEL
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Attorney for Respondents J. Al
Cannon, Jr., Charleston County
Sheriff's Dept., Charleston County
Revenue Collections Dept., and
Harry Long

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**RESPONDENTS J. AL CANNON, JR., CHARLESTON COUNTY
SHERIFF'S DEPT., CHARLESTON COUNTY REVENUE COLLECTIONS
DEPT., and HARRY LONG'S PROOF OF SERVICE**

I certify that I have served copies of Respondents J. Al Cannon, Jr., Charleston County Sheriff's Dept., Charleston County Revenue Collections Dept., and Harry Long's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Motion under Rule 208 (b)(5) SCACR to Exceed Length of Brief by depositing a copy of each in the United States Mail, postage prepaid, on April 28th, 2015 addressed to attorneys of record Edward A. Bertele, 1812 Pierce Street, Charleston, South Carolina 29492 and Wendy J. Keefer, Keefer & Keefer, LLC, 1643B Savannah Highway, Suite 226, Charleston, South Carolina 29492.



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April 28, 2015

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

RE: Roosevelt Simmons v. Mase and Company, LLC, et al, South Carolina Court of Appeals (Case No. 2014-002575)

Dear Clerk:

Enclosed for filing on behalf of Respondents J. Al Cannon, Jr., Charleston County Sheriff's Dept., Charleston County Revenue Collections Dept., and Harry Long please find an original and one copy of the following:

- (1) Initial Brief
- (2) Designation of Matter to be Included in the Record on Appeal;
- (3) Motion Under Rule 208(b)(5) SCACR to Exceed Length of Brief (with a firm check in the amount of \$25.00 representing the filing fee for the Motion); and
- (4) Proof of Service of the above.

Please file the original and return file-stamped copies to me in the self-addressed, stamped envelope enclosed for your convenience. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Christopher T. Dorsel

llc
Enclosures

cc: (with copy of enclosures)
Wendy J. Keefer
Edward A. Bertele



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SC Court of Appeals

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