

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

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Case No. 2012-207028

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Elinor Cohen,

Respondent,

v.

Tripp Creech d/b/a Atlantic  
Lawn Service, Inc.

Appellants.

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**MOTION FOR LEAVE TO FILE FINAL BRIEF PAST DEADLINE**

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Daniel M. Bradley, Esq.  
Brent B. Greenberg, Esq.  
Daniel M. Bradley Law Firm, LLC  
103 Church Street  
PO Box 2061  
Mt. Pleasant, SC 29465  
Attorneys for Respondent

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SC Court of Appeals

PLEASE TAKE NOTICE that the Respondent, Elinor Cohen, by and through the undersigned counsel, hereby moves before the Presiding Judge of the Court of Appeals for an Order pursuant to Rules 211, 263, and 240 of the South Carolina Rules of Appellate Procedure allowing Respondent to file its Final Brief outside of the allotted time due to excusable neglect. Since the Initial Brief has already been filed, no prejudice will result to Appellant. This Motion is made on the basis of the furtherance of the ends of justice, Rules 211, 263 and 240 SCACR, and Rule 6(b)(1)(B) SCRCP.

This Motion shall be based on the pleadings as well as the substantive and procedural law of South Carolina.

AND IT IS SO MOVED.

DANIEL M. BRADLEY LAW FIRM, LLC



Daniel M. Bradley, Esquire (SC Bar # 72396)  
103 Church Street  
PO Box 2061  
Mt. Pleasant, SC 29465  
Tel: (843) 834-0178  
Fax: (843) 654-5109  
ATTORNEYS FOR RESPONDENT

September 10, 2012  
Mt. Pleasant, SC

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

Case No. 2012-207028

Elinor Cohen,

Respondent,

v.

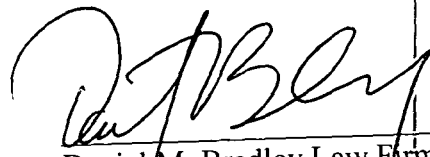
Tripp Creech d/b/a Atlantic  
Lawn Service, Inc.

Appellants.

**PROOF OF SERVICE**

I certify that I have served the Notice of Motion & Motion for Leave to File Final Brief of Respondent on Tripp Creech d/b/a Atlantic Lawn Service Inc. by depositing a copy of it in the United States Mail, postage prepaid, on September 10, 2012, addressed to his attorney of record, Ellis R. Lesemann, 497 Bramson Court, Suite 201, Mt. Pleasant, South Carolina 29464.

September 10, 2012



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September 10, 2012

South Carolina  
Court of Appeals  
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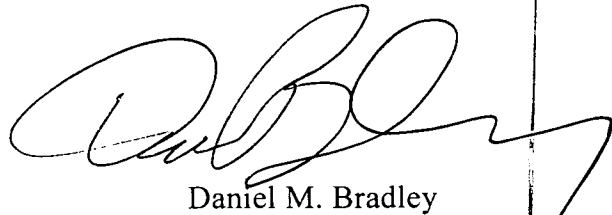
RE: Elinor Cohen v. Tripp Creech d/b/a Atlantic Lawn Service, Inc.  
Case #: 2012-207028

Dear Clerk:

Please find enclosed herein for filing an original and six (6) copies of Respondent's Motion for Leave to File Final Brief Past Deadline, and an original and fourteen (14) bound copies of Respondent's Final Brief. If you have any questions, feel free to contact me directly at the above telephone or email address.

With kind regards,

RECEIVED  
SEP 11 2012  
SC COURT OF APPEALS



Daniel M. Bradley

C.c: Ellis R. Leemann, Esq.

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