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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

Appeal from Horry County

The Honorable Clifton B. Newman, Circuit Court Judge

PAUL CURRY.....APPELLANT,

V.

TOWN OF ATLANTIC BEACH.....RESPONDENT.

APPELLATE CASE NO.: 2015-001398

TO FILE INITIAL BRIEF  
OUT OF TIME

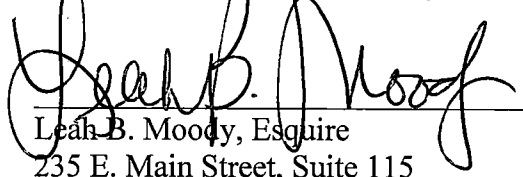
Counsel for Town of Atlantic Beach respectfully moves to file an extension request out of time.

In support of this petition, counsel shows:

- (1) The petition for the initial brief of appellant were due to filed on November 14, 2015.
- (2) Counsel requested an extension until December 14, 2015.
- (3) Subsequently, due to staff changes, counsel has not be able to complete her initial reply brief by the extension and inadvertently failed to file her request by the due date of the Court, December 14, 2015.
- (4) Counsel failed to file by January 14, 2016 and the counsel for respondent now seeks to file out of time Respondent's Initial Brief.

For these reasons, counsel for respondent respectfully asks for permission to file out of time.

Respectfully submitted,  
**Law Office of Leah B. Moody, LLC**

A handwritten signature in black ink, appearing to read "Leah B. Moody", is written over a horizontal line.

Leah B. Moody, Esquire  
235 E. Main Street, Suite 115  
Post Office Box 1015  
Rock Hill, South Carolina 29731

Attorney for Respondent

February 11, 2016  
Rock Hill, S.C.