

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of General Sessions

Daniel D. Hall, Circuit Court Judge

2015-001817

The City of Rock Hill.....Appellant.

v.

Anthony M. Ketchum.....Respondent.

RESPONDENT'S MOTION TO DISMISS APPEAL

RECEIVED

MAY 16 2016

SC Court of Appeals

COMES NOW THE RESPONDENT, Anthony M. Ketchum, by and through his undersigned counsel of record, and does hereby move this Court to dismiss this appeal.

On March 23, 2016 this Court notified counsel for Appellant that the initial brief and designation of matter had not been filed pursuant to Court rules and that the matter would be dismissed if counsel made no motion for permission to file such outside of the designation time.

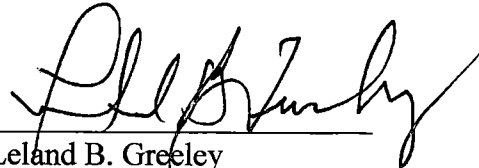
Counsel made no motion, nor any filing, in response to the letter.

The Court didn't dismiss the appeal following the 10 day deadline imposed by the letter of March 23, 2016.

The Court then sent another letter to counsel for the Appellant dated May 6, 2016 indicating the same and giving until May 16 for the filing of a motion for permission to file outside of time. To date counsel for Respondent has received no copy of such a motion.

Respondent submits that Appellant's counsel has been provided adequate time to correct the tardiness of filings and respectfully requests the case be dismissed pursuant to the directive of the March 23, 2016 letter.

Respectfully submitted,



Leland B. Greeley
128 East Main Street, Suite 102
Post Office Box 2981
Rock Hill, South Carolina 29732
(803) 329-0088 S.C. Bar # 7850
Attorney for Respondent

May 12, 2016

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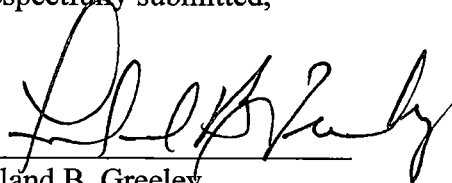
Anthony M. Ketchum.....Respondent.

CERTIFICATE OF SERVICE

I certify that I have served this day a copy of Respondent's Motion to Dismiss Appeal on the attorney for the Appellant by U.S. Mail with sufficient postage affixed thereto to be delivered below:

Christopher Edward Barton, Esquire
201 East Main Street
3rd Floor
Rock Hill, South Carolina 29730

Respectfully submitted,



Leland B. Greeley
128 East Main Street, Suite 102
Post Office Box 2981
Rock Hill, South Carolina 29732
(803) 329-0088 S.C. Bar # 7850
Attorney for Respondent

May 12, 2016

**LELAND B. GREELEY, P.A.
ATTORNEY**

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May 12, 2016

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

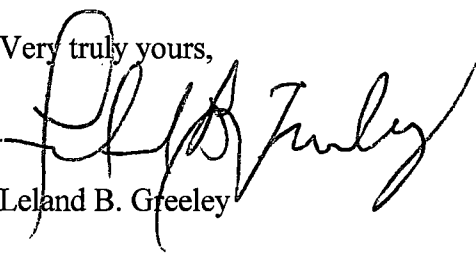
RE: The City of Rock Hill v. Anthony M. Ketchum,
Appellate Case No. 2015-001817

Dear Ms. Kitchings:

Please find enclosed the original, along with 6 copies, of Respondent's Motion to Dismiss Appeal, with a Certificate of Mailing for filing in your office. By copy of this letter, I am serving Counsel for the Appellant.

With kindest regards, I remain

Very truly yours,


Leland B. Greeley

/adt
Enclosures

cc: Christopher Edward Barton, Esquire



Leland Greeley
P. O. Box 2981 (mailing)
128 E. Main St., Ste. 102 (physical)
Rock Hill, SC 29732

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