

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEE COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2008- CP-31-192

Patricia Rhodes JohnsonAppellant,

vs.

Robert E. Lee Academy, Inc., Jennifer Hostler, Marc Quigley,
Moore, Beauston & Woodham, LLP, Moore, Kirkland &
Beauston, LLP, and City of Bishopville.....Defendants.

of which

Moore, Beauston & Woodham, LLP is theRespondent.

MOTION TO ALLOW FINAL REPLY BRIEF OF APPELLANT

PLEASE TAKE NOTICE, that the Appellant, by and through her undersigned counsel, and with consent from counsel for the Respondent, moves before this Honorable Court requesting that Appellant be allowed to file the Final Reply Brief of Appellant originally due on or about February 21, 2011. The Appellant's Reply Brief was timely filed on December 1, 2011; however, a clerical error inadvertently caused the Final Reply Brief of Appellant to not be timely filed.

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SC Court of Appeals

WHEREFORE counsel for the Appellant requests an order from this Court
permitting Appellant to file Appellant's Final Reply Brief.

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a horizontal line and a wavy tail.

James B. Moore III, Esq. (SC Bar No. 74268)

J. Edward Bell, III, Esq. (SC Bar No. 631)

Law Offices of J. Edward Bell LLC

232 King Street

Georgetown, S.C. 29442

Attorneys for Appellant

May 2, 2012

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Beauston, LLP, and City of Bishopville.....Defendants

of which

Moore, Beauston, & Woodham, LLP is theRespondent.

PROOF OF SERVICE

I certify I have served a copy of Final Reply Brief of Appellant and Motion to Allow Final Reply Brief by Appellant by electronic mail and by depositing a copy of it in the United States Mail, postage prepaid, on May 2, 2012, addressed to Mason Summers, Anthony E. Rebollo, Francis M. Mack, Esquire, Richardson, Plowden & Robinson, 1900 Barnwell Street, Columbia, SC 29201, FMack@RichardsonPlowden.com.

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James B. Moore, III (SC Bar No 74268)
J. Edward Bell (SC Bar No. 631)
The Bell Legal Group
Post Office Box 2590
232 King Street
Georgetown, SC 29440
(843) 546-2408
ATTORNEYS FOR THE APPELLANT

May 1, 2012

The Honorable Tanya A. Gee
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Patricia Rhodes Johnson vs Robert E. Lee Academy, Moore
Beauston and Woodham, and City of Bishopville
Civil Action Number 2008-CP-31-00192
Our File Number 9025.0001

Dear Ms. Gee:

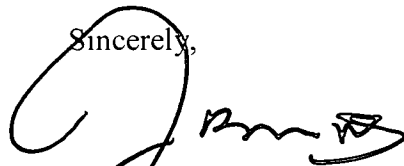
Enclosed please find an original, unbound copy of the Final Reply Brief of Appellant and Certificate of Counsel, as well as 14 copies. I am also enclosing Appellant's Motion to Allow Final Reply Brief of Appellant and Proof of Service for all documents.

By copy of this letter, I am forwarding a copy of the brief to opposing counsel.

Please file the original Proof of Service and return a clocked copy to me in the enclosed self-addressed, stamped envelope.

With kind regards, I am

Sincerely,



James Bernice Moore, III
The Bell Legal Group

JBM/khf
Enclosures
cc: Mark Summers, Esquire (w/ encl.)

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SC Court of Appeals

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