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THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM FAIRFIELD COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2015-001178

Corey Ross,.....Appellant,

v.

Carolina Adventure World, LLC,Respondent.

**MOTION TO FILE RECORD ON APPEAL OUT OF TIME AND EXTENSION
OF TIME**

The undersigned, as counsel for Appellant Corey Ross, hereby respectfully moves this Court for permission to file the Record on Appeal out of time and for an extension of time. This Motion is made on the grounds that during the compilation of the Record on Appeal, it was discovered that pages were missing from the bound hearing transcripts. This issue has not yet been resolved. In addition, Appellant's counsel experienced a change in staffing and disruption in normal business operations. For these reasons, Appellant was unable to file by the established deadline of June 30, 2016. The failure to file the Record on Appeal was inadvertent and due to extraordinary circumstances. This request is not intended for purposes of delay. Further, there would be no prejudice to the parties by

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JUL 08 2016
SC Court of Appeals

Cory Ross,..... Appellant,

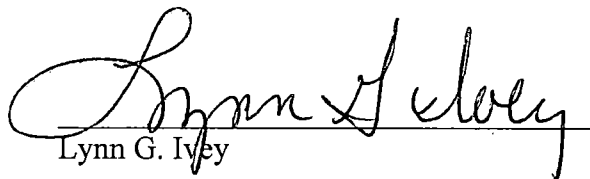
v.

Carolina Adventure World, LLC,,..... Respondents.

AMENDED PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA certify that I served the Motion for Extension of Time to File Appellant's Reply Brief on counsel of record for Respondents in this action by depositing a copy of same in the US Mail, postage prepaid, on June 15, 2016 to:

Kenneth R. Raynor, Esquire
RAYNOR LAW FIRM, PLLC
1018 East Blvd., Suite 6
Charlotte, NC 28203


Lynn G. Ivey

West Columbia, South Carolina
July 8, 2016

allowing the Appellant to file the Record on Appeal out of time and granting an extension of time.

WHEREFORE, Appellant respectfully prays that this Court allow the Record on Appeal to be filed out of time and grants an extension of time to resolve the transcript issue.

Respectfully submitted,



S. Jahue Moore
MOORE TAYLOR LAW FIRM, P.A.
P.O. Box 5709
West Columbia, South Carolina 29171
Telephone: 803-796-9160

Attorney for Appellant Corey Ross

West Columbia, South Carolina

July 8, 2016

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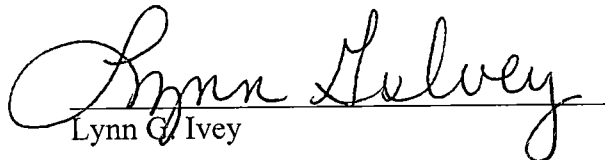
Carolina Adventure World, LLC,, Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA certify that I have served the Appellant's Motion to File Record on Appeal Out of Time and Extension of Time on counsel of record for Respondent in this action by depositing a copy of same in the US Mail, postage prepaid, on July 8, 2016 to:

Christian Stegmaier, Esq.
Meghan Hazelwood Hall, Esq.
COLLINS AND LACY, P.C.
P.O. Box 12487
Columbia, SC 29201

Kenneth R. Raynor, Esquire
RAYNOR LAW FIRM, PLLC
1018 East Blvd., Suite 6
Charlotte, NC 28203


Lynn G. Ivey

West Columbia, South Carolina
July 8, 2016

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SC Court of Appeals

July 8, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

RE: Corey Ross v. Carolina Adventure World, LLC
Appellate Case No. 2015-001178

S. Jahue Moore*
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley*
Sheila McNair Robinson
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Sarah Taylor Cassidy
Gregory R. Close

Robert D. Hazel
OF COUNSEL
Billy C. Coleman
RETIRED

Dear Ms. Kitchings:

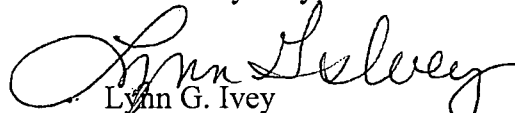
I trust this letter finds you well. Please find attached for filing the Appellant's Motion to File the Record on Appeal Out of Time and Extension of Time in this matter. Our firm check(s) are also attached. Please return the extra clocked copies via our courier.

As noted in the motion, while compiling the record, we found that three pages are missing from the hearing transcripts. We are in the process of obtaining the necessary documents and attach a copy of our letter to the court reporter requesting the same.

In addition, I enclose an amended proof of service for the June 15, 2016, service of Appellant's Motion for Extension of Time to File Appellant's Reply Brief. An error was found in the Amended Proof of Service served on June 15, 2016, and subsequently filed with the Court. We apologize for this error.

Thank you for your assistance with this matter. Please call our office with any questions or concerns.

Yours very truly,


Lynn G. Ivey
Assistant to John C. Bradley, Jr.

Enclosures

cc: Christian Stegmaier
Kenneth Raynor
Shirley G. Broom

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