

80380

IN THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

RECEIVED

JUL 25 2016

SC Court of Appeals

FROM THE SOUTH CAROLINA COURT OF COMMON PLEAS
Honorable Renee Allyson Lee, Judge

Case No.: 2016-000491

Crystal Faye Clark APPELLANT

v.

Housing Authority of the City of Columbia RESPONDENT

**NOTICE OF MOTION AND MOTION TO
FILE INITIAL BRIEF OUT OF TIME**

Johnny E. Watson, Sr.
Watson Law Firm
P. O. Box 2305 (29202)
2715 Edgewood Avenue
Columbia, South Carolina 29204

(803) 400-1600 Phone
(803) 400-1200 Fax
watsonlawfirm@sc.twcbc.com

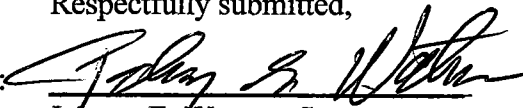
Counsel for Appellant,
Crystal Clark

PLEASE TAKE NOTICE that the above-named Appellant, Crystal Faye Clark, by and through her attorney, undersigned, will move before the Presiding Judge of the Court of Appeals, on the 10th day hereafter, or as soon as this matter may be heard, for an Order allowing her to file her initial brief out of time based on the statutory and common laws of this state, the Rules of Court procedure and the following facts:

1. The attorney for the Appellant believed that he timely filed the Appellant's brief based on his calculation 35 days since he was served the transcript by mail but tat calculation was in error and
2. There is Appellant believes her case to be meritorious and
3. Tha Respondent is not prejudiced by allowing the additional time for filing the initial brief.

Respectfully submitted,

BY:



Jonny E. Watson, Sr.
Attorney at Law, SCB# 5967
P. O. Box 2305 (29202)
2715 Edgewood Avenue
Columbia, South Carolina 29204
(803) 400-1600 Phone
(803) 400-1200 Fax
watsonlawfirm@sc.twcbc.com

Columbia, South Carolina
Dated: July 25, 2016

CERTIFICATE OF SERVICE

I hereby certify that I served the Notice of Motion and Motion to Reconsider Dismissal of the Plaintiff's case on parties indicated below, by placing the document in the U.S. Mail postage pre-paid on the date indicated below.

RECEIVED

JUL 25 2016

SC Court of Appeals

DOCUMENT SERVED: NOTICE OF MOTION AND MOTION TO RECONSIDER DISMISSAL OF TIME.

PERSON SERVED: ATTORNEY KENNETH A. DAVIS
BOYKIN AND DAVIS, LLC
ATTORNEY FOR THE DEFENDANT
220 STONERIDGE DRIVE, SUITE 100
COLUMBIA, SOUTH CAROLINA 29210


Johnny E. Watson, Process Server

Columbia, South Carolina
Dated: July 25, 2016