

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

RECEIVED
SEP 22 2016
SC Court of Appeals

Corey Ross,.....Appellant,

v.

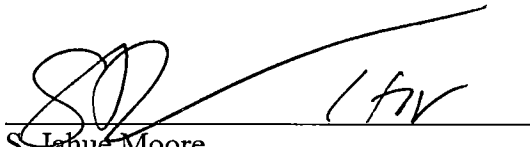
Carolina Adventure World, LLC,Respondent.

MOTION TO FILE FINAL BRIEF AND FINAL REPLY BRIEF OUT OF TIME

The undersigned, as counsel for Appellant Corey Ross, hereby respectfully moves this Court for permission to file the Final Brief of Appellant and Final Reply Brief of Appellant outside of the deadlines established by Rule 211 SCAR. Appellant's counsel recently experienced a change in staffing and disruption in normal business operations. The failure to file the Final Brief and Final Reply Brief was inadvertent and due to extraordinary circumstances. This request is not intended for purposes of delay. The Final Brief and Final Reply Brief are being submitted concurrently with this motion. Further, there would be no prejudice to the parties by allowing the Appellant to file the Final Brief and Final Reply Brief outside of the deadlines

WHEREFORE, Appellant respectfully prays that this Court allow the Final Brief and Final Reply Brief of Appellant to be filed out of time.

Respectfully submitted,



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Attorney for Appellant Corey Ross

West Columbia, South Carolina

September 22, 2016

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Cory Ross, Appellant,

v.

Carolina Adventure World, LLC,, Respondents.

PROOF OF SERVICE

I, Martin A. Ebert, an employee of Moore Taylor Law Firm, PA certify that I have served the Motion to File Appellant's Final Brief and Final Reply Brief on counsel of record for Respondents in this action by depositing a copy of same in the US Mail, postage prepaid, on September 22, 2016 to:

Christian Stegmaier, Esq.
Kelsey J. Brudvig, Esq.
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