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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity

RECEIVED
DEC 07 2016
SC Court of Appeals

Case No. 2016-001440

Carolina Chloride, Inc.,Appellant,

v.

South Carolina Department of Transportation,Respondent.

**MOTION TO FILE APPELLANT'S INITIAL
REPLY BRIEF OUT OF TIME**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF
APPEALS:

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate
Court Rules, counsel for Appellant Carolina Chloride, Inc., LLC respectfully
moves this Court for an Order granting its leave to file Appellant's Initial
Reply Brief out of time. The deadline for Appellant's Initial Reply Brief was
December 5, 2016.

Counsel for Appellant represents to this Court that they have been conscientious in their efforts to prepare Appellant's Initial Reply Brief. However, due to counsel's current caseload and schedule, counsel was unable to file the Appellant's Initial Reply Brief on Monday, December 5, 2016. Counsel respectfully requests that this Court grant this motion and accept Appellant's Initial Reply Brief which accompanies this motion.

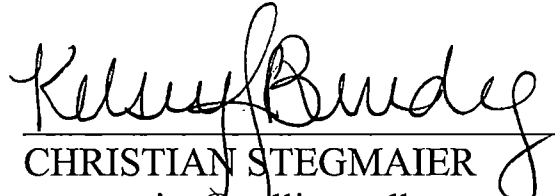
This is counsel's first motion to file Appellant's Initial Reply Brief out of time. Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By:



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ATTORNEYS FOR APPELLANT

MOTION TO FILE APPELLANT'S
INITIAL REPLY BRIEF OUT OF TIME

Columbia, South Carolina
December 6, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
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Joseph M. Strickland, Master-in-Equity

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v.

South Carolina Department of Transportation,Respondent.

PROOF OF SERVICE

I hereby certify that I served Appellant's Motion To File Appellant's Initial Reply Brief Out Of Time upon all parties, by placing a copy in the United States mail, postage prepaid, to the below listed parties on December 6, 2016, addressed to the following:

Beacham O. Brooker, Jr., Esquire
754 Kilbourne Road
Columbia, SC 29205

Counsel for Respondent

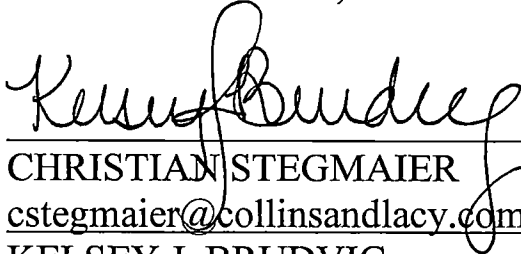
Edward D. Sullivan
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Post Office Box 11714
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Co-counsel for Appellant

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR APPELLANT

PROOF OF SERVICE – MOTION TO
FILE APPELLANT’S INITIAL REPLY
BRIEF OUT OF TIME

Columbia, South Carolina
December 6, 2016



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

December 6, 2016

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

DEC 07 2016

SC Court of Appeals

Re: Carolina Chloride, Inc. v. South Carolina Department of Transportation
Civil Action No. 2016-001440
C&L File No. 001114-00102

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Appellant's Motion to file its Initial Reply Brief out of time in connection with the above referenced matter. Also, enclosed are the original and one copy of Appellant's Initial Reply Brief and Proof of Service in connection with the above referenced matter. Lastly, we have also enclosed our firm's check in the amount of \$25.00, representing the filing fee of the motion. Please file the originals and return a clocked copy of each to us via our courier.

By copy of this letter to counsel of record, we are serving same on him.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,

A handwritten signature in cursive script that reads "Kenny Bundy for". The signature is written in black ink and is positioned above the printed name of the signatory.

Christian Stegmaier

CS/mmm

Enclosures

cc: Beacham O. Brooker, Jr., Esquire
Edward D Sullivan, Esquire
Christian Stegmaier, Esquire