

81925

RECEIVED

DEC 16 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

L. Casey Manning, Circuit Court Judge  
Trial Court Case No. 2011-CP-40-01320

Appellate Case No. 2016-000213

Delories Jenkins,.....Respondent,

v.

Refuge Temple Church of God in Christ, Inc., and Wayne Penn, Sr., Daniel Ward, Jr.,  
James A. Tucker, and Eronda Jackson, Individually and as Members of the Board of  
Directors of Refuge Temple Church of God in Christ, Inc.,..... Defendants.

of whom


Refuge Temple Church of God in Christ, Inc., is..... Appellant

**MOTION TO FILE REPLY BRIEF OUT OF TIME**

Appellant, Refuge Temple Church of God in Christ, Inc., through its undersigned attorney, hereby respectfully moves for leave to file its Reply Brief out of time. Good cause exists in that Respondent's Brief was received just after Thanksgiving, during a week when counsel was up for trial in three counties and co-counsel had four days of mediation scheduled back-to-back in two large construction defect lawsuits. Additionally, counsel had depositions and other prior commitments. This case has been delayed a number of times due to factors beyond Appellant's control. In order to prevent any further delay, Appellant is filing the Record on Appeal today also.

*(signature on following page)*

December 16, 2016

  
Peter E. Farr, Esquire  
Timothy J. Newton, Esquire  
Murphy & Grantland, P.A.  
P.O. Box 6648  
Columbia, SC 29260  
(803) 782-4100  
Attorney for Appellant

Cc: Walter Marion Riggs, Esquire

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

---

Case No. 2011-CP-40-01320

---

Refuge Temple Church Of God In Christ, Inc.,.....Appellant,

v.

Delories Jenkins,.....Respondent.

---

PROOF OF SERVICE

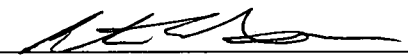
---

I certify that I have served the Appellant's Motion to File Reply Brief Out of Time upon Delories Jenkins, via regular mail, on December 16, 2016, to her attorney of record, Walter M. Riggs, Hanson Law Firm, PA, 6156 St. Andrews Rd., #101, Columbia, SC 29212.

December 16, 2016

MURPHY & GRANTLAND, P.A.

---



Peter E. Farr, Esquire  
Timothy J. Newton, Esquire  
P.O. Box 6648  
Columbia, SC 29260  
(803) 782-4100  
Attorneys for Appellant Refuge Temple  
Church Of God In Christ, Inc.



MURPHY & GRANTLAND, P.A.

Peter E. Farr  
Direct dial 803-454-1234  
pfarr@murphygrantland.com

December 16, 2016

**VIA HAND DELIVERY**

The Honorable Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

DEC 16 2016

**SC Court of Appeals**

Re: Delories Jenkins v. Refuge Temple Church of God, Inc., Wayne Penn, Sr., Daniel Ward, Jr., James A. Tucker, Eronda Jackson, Ind. and as Members of the Board of Directors of Refuge Temple Church of God in Christ, Inc.

Appellate Case No: 2016-000213  
Civil Action No.: 2011-CP-40-1320  
Our File No.: 1360-0072

Dear Ms. Kitchings:

Enclosed please find the original and eight copies of the Appellant Refuge Temple of God in Christ, Inc.'s Motion to File Reply Brief Out of Time with regard to the above-referenced matter. Please file the original and six copies with your office and return the remaining filed copies to my courier delivering same. I have also enclosed this firm's check in the amount of \$25.00 for the fee associated with the filing of this Motion.

I appreciate your assistance in this matter, and if you have any questions or need any further information from me, please do not hesitate to call.

Sincerely yours,

Peter E. Farr

PEF/smr  
Enclosures  
Cc: Walter M. Griggs, Esquire