

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Kristi Lea Harrington, Circuit Court Judge

Common Pleas Case No. 2013-CP-10-7413
Appellate Case No. 2015-001788

RECEIVED

MAY 31 2017

SC Court of Appeals

Affordable Concrete and Masonry d/b/a RSS, LLC..... Respondent,

v.


Roper Hanks, LLC.....Appellant.

**APPELLANT ROPER HANKS, LLC AND RESPONDENT AFFORDABLE CONCRETE
AND MASONRY D/B/A RSS, LLC'S CONSENT MOTION FOR APPELLANT TO FILE
REPLY BRIEF TO RESPONDENT'S FINAL BRIEF**

WILL YOU PLEASE TAKE NOTICE that by and through their undersigned counsel, Appellant Roper Hanks, LLC and Respondent Affordable Concrete and Masonry d/b/a RSS, LLC hereby respectfully move and request that this Court permit the filing and consideration of Appellant's Reply Brief to Respondent's **Final** Brief. This Final Reply Brief by Appellant to Respondent's Final Brief is substantively identical to Appellant's Reply Brief to the Respondent's **Initial** Brief that was filed on March 17, 2016. Given the impending oral argument in this case set for June 6, 2017, and upon instruction of the Case Manager, Appellant is filing Appellant's Reply Brief to Respondent's Final Brief in conjunction with this Motion.

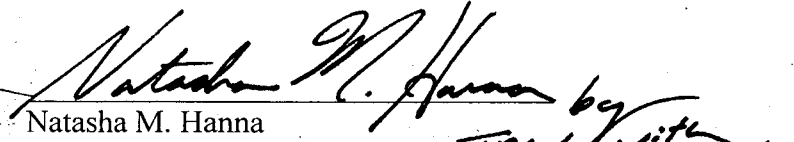
Signature page to follow

WE SO MOVE:



Paul E. Sperry
State Bar No.: 68441
Tyler P. Winton
State Bar No.: 77877
CARLOCK COPELAND & STAIR, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
Phone: (843) 727-0307
Attorneys for Roper Hanks, LLC

WE SO MOVE:



Natasha M. Hanna
Mallory W. Hitchcock
Law Office of Natasha M. Hanna, P.C.
4712 Jenn Drive, Suite A
Myrtle Beach, SC 29577
Phone: (843) 839-8002
**Attorneys for Affordable Concrete and
Masonry d/b/a RSS, LLC**

TPW with consent

May 30, 2017

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Kristi Lea Harrington, Circuit Court Judge

Common Pleas Case No. 2013-CP-10-7413
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SC Court of Appeals

Affordable Concrete and Masonry d/b/a RSS, LLC..... Respondent,

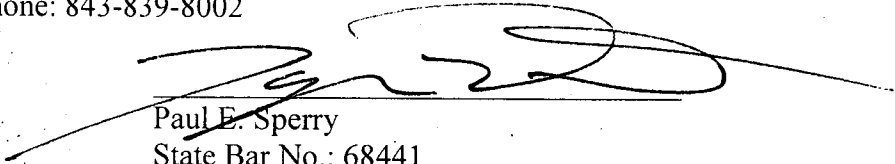
v.

Roper Hanks, LLC.....Appellant.

PROOF OF SERVICE

I certify that I have served the forgoing Appellant Roper Hanks, LLC and Respondent Affordable Concrete and Masonry d/b/a RSS, LLC's Consent Motion for Appellant to File Reply Brief to Respondent's Final Brief upon the parties below by depositing a copy of it in the United States Mail, postage prepaid, on May 30, 2017, addressed as follows:

Natasha M. Hanna, Esq.
4717 Jenn Drive, Suite 102
Myrtle Beach, SC 29577
Phone: 843-839-8002


Paul E. Sperry
State Bar No.: 68441

Tyler P. Winton
State Bar No.: 77877

CARLOCK COPELAND & STAIR, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
Phone: (843) 727-0307
Attorneys for Appellant Roper Hanks,
LLC

LAW OFFICES

CARLOCK COPELAND & STAIR, LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

TYLER WINTON

DIRECT DIAL NUMBER
843-266-8237

E-MAIL ADDRESS
twinton@carlockcopeland.com

FACSIMILE
843-727-2995

40 CALHOUN STREET, SUITE 400
CHARLESTON, SC 29401

TELEPHONE 843.727.0307

www.carlockcopeland.com

ATLANTA OFFICE

191 Peachtree Street NE, Suite 3600
Atlanta, Georgia 30303
404.522.8220

REPLY TO CHARLESTON OFFICE

May 30, 2017

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SC Court of Appeals

VIA FEDERAL EXPRESS

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

Re: Affordable Concrete and Masonry d/b/a RSS, LLC, Respondent v. Roper Hanks, LLC, Appellant
Appellate Case No. 2015-001788

Dear Ms. Kitchings:

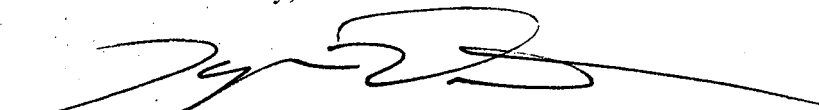
Please find enclosed herewith the original and one copy of Appellant Roper Hanks, LLC and Respondent Affordable Concrete and Masonry d/b/a RSS, LLC's Consent Motion for Appellant to file its Reply Brief to Respondent's Final Brief, as well as fifteen (15) copies of Appellant's Reply Brief to Respondent's Final Brief. This Final Reply Brief by Appellant to Respondent's **Final** Brief is substantively identical to Appellant's Reply Brief to the Respondent's **Initial** Brief that was filed on March 17, 2016.

Given the impending oral argument in this case set for June 6, 2017, and upon instruction of the Case Manager, please find enclosed herewith for filing fifteen (15) bound and gray-covered copies of the Final Reply Brief by Appellant to Respondents Final Brief. Please file the original and return one file-stamped copy to me in the self-addressed, stamped envelope provided herewith.

By copy of this letter, I am serving counsel for the Respondent, Natasha M. Hanna, Esquire, with Appellant's Reply Brief to Respondent's Final Brief and Consent Motion for Appellant to file Reply Brief to Respondent's Final Brief.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,



Tyler P. Winton

TPW/emm
Enclosures

cc (w/enc.): Natasha Hanna, Esq.