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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Nate Fata, Special Referee

Lower Court Case No. 2016-CP-26-8032  
Court of Appeals Case No. 2017-001817

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NOV 02 2017  
SC Court of Appeals

DANIEL ERIC KNIGHT,

Respondent,

v.

PHILLIP RAY CAUSEY,

Appellant.

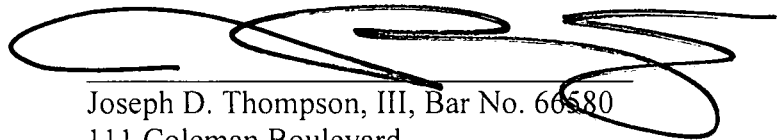
**MOTION TO FILE INITIAL BRIEF OF APPELLANT  
BEYOND TIME OF SCACR 208**

The Appellant Phillip Ray Causey hereby moves this Honorable Court pursuant to Rule 240, South Carolina Appellate Court Rules, for an Order allowing him to submit his Initial Brief on or before November 30, 2017. The Notice of Appeal was served August 31, 2017 and filed with this Court on September 1, 2017. On September 12, 2017, Appellant served his Certificate of Compliance with SCACR 207, which was filed with this Court on September 13, 2017. Appellant's attorney's paralegal misinterpreted his communication with Court staff and, as a result, the undersigned believed that further communication would come from the Court regarding the timing of the Initial Brief. The information provided by the paralegal to the undersigned was incorrect and, given the initial filings, Appellant's Initial Brief was due on or before October 2, 2017 (thirty days would have expired on September 30, 2017, a Saturday, thereby extending the deadline to the following Monday).

The Appellant's request to serve the Initial Brief on or before November 30, 2017 will not unduly delay this appeal or prejudice Respondent. As a point of information, Hurricane activity and the undersigned's move into a new office in September 2017 would almost assuredly have prompted a request for a thirty day extension which, if granted, would have made the deadline November 1, 2017 (today's date). The undersigned is currently scheduled for four days of arbitrations beginning November 13, 2017 and, given the Thanksgiving holiday, the extension requested to November 30, 2017, would, respectfully, allow the undersigned reasonable opportunity to file and serve Appellant's Initial Brief.

For good cause shown, and without undue delay and/or prejudice to Respondent, Appellant respectfully requests this Honorable Court issue an Order granting the requested relief and permitting Appellant to file and serve his Initial Brief on or before November 30, 2017.

Respectfully submitted,



Joseph D. Thompson, III, Bar No. 66580  
111 Coleman Boulevard  
Suite 301  
Mount Pleasant, South Carolina 29464  
Telephone: (843) 720-3460

*Attorneys for Appellant, Phillip Ray Causey*

Dated: November 1, 2017

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DANIEL ERIC KNIGHT,

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Appellant.

**PROOF OF SERVICE**

I certify that I have served Appellants Motion to File Initial Brief of Appellant Beyond Time of SCACR 208 upon the Respondent by way of U.S. Mail, stamped First Class delivery, on November 1, 2017, addressed to Respondent's attorneys of record, addressed as follows:

Ian D. Maguire, Esquire  
P. Brooke Eaves, Esquire  
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1600 North Oak Street  
Suite B  
Myrtle Beach, South Carolina 29577

Blake A. Hewitt, Esquire  
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Telephone: (843) 720-3460  
*Attorneys for Appellant, Phillip Ray Causey*

Dated: November 1, 2017

**H | B | S** HALL BOOTH SMITH, P.C.

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November 1, 2017

**VIA FEDERAL EXPRESS PRIORITY OVERNIGHT**

South Carolina Court of Appeals  
Clerk of Court Office  
**ATTN: AMELIA SMITH**  
1220 Senate Street  
Columbia, South Carolina 29201

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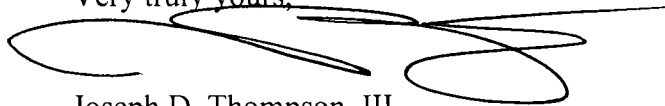
**RE: *Knight v. Causey***  
**Lower Court Case No.: 2016-CP-26-8032**  
**Court of Appeals Case No.: 2017-001817**

Dear Amelia:

In follow up to our conversation, enclosed please find the original and six copies of Appellant's Motion to File Initial Brief of Appellant Beyond Time of SCACR 208, with regard to the above-referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the motion filing fee.

I have included an extra copy of the Motion, and would appreciate your returning the filed copy to our office in the enclosed self-addressed stamped envelope. Thank you for your assistance in this matter. If you have any questions and/or concerns, please do not hesitate to contact our office.

Very truly yours,



Joseph D. Thompson, III

JDT/sb

cc: Ian D. Maguire, Esquire (via email)  
P. Brooke Eaves, Esquire (via email)  
Blake A. Hewitt, Esquire (via email)