

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of General Sessions

Daniel D. Hall, Circuit Court Judge

2015-001817

**RECEIVED**

NOV 08 2017

SC Court of Appeals

The City of Rock Hill.....Appellant.  
v.  
Anthony M. Ketchum.....Respondent.

**RESPONDENT’S OBJECTION TO APPELLANT’S MOTION TO RETURN  
REMITTITUR**

COMES NOW THE RESPONDENT, Anthony M. Ketchum, by and through his undersigned counsel of record, and does hereby object to the recalling of the remittitur in this matter. On March 23, 2016 this Court notified counsel for the City of Rock Hill that the initial brief and designation of matter had not been filed pursuant to Court rules and that the matter would be dismissed if counsel made no motion for permission to file such outside of the designation time.

Counsel made no motion, nor any filing, in response to the letter.

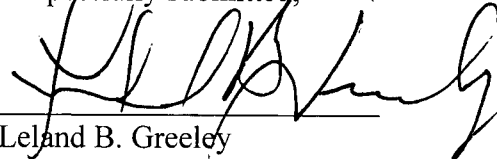
The Court didn’t dismiss the appeal following the ten day deadline imposed by the letter of March 23, 2016.

The Court sent another letter to counsel for the City of Rock Hill dated May 6, 2016 indicating the same and giving until May 16 for the filing of a motion for permission to file outside of time. The City of Rock Hill failed to do so.

This Court issued an Order filed May 20, 2016 dismissing this matter. The matter was then remitted to the lower court seventeen months ago.

My client has moved on with his life and it is submitted that allowing the recall of the remittitur would not serve the ends of justice and would be highly prejudicial to Mr. Ketchum.

Respectfully submitted,



Leland B. Greeley  
128 East Main Street, Suite 102  
Post Office Box 2981  
Rock Hill, South Carolina 29732  
(803) 329-0088 S.C. Bar # 7850  
Attorney for Respondent

November 6, 2017

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In The Court of Appeals

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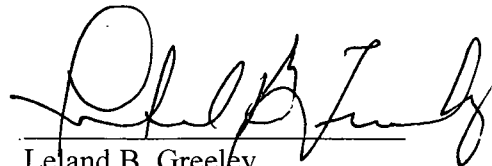
The City of Rock Hill.....Appellant.  
v.  
Anthony M. Ketchum.....Respondent.

CERTIFICATE OF SERVICE

I certify that I have served this day a copy of Respondent's Objection to Appellant's Motion to Return Remittitur on the attorney for the Appellant by U.S. Mail with sufficient postage affixed thereto to be delivered below:

Christopher Edward Barton, Esquire  
201 East Main Street  
3<sup>rd</sup> Floor  
Rock Hill, South Carolina 29730

Respectfully submitted,



Leland B. Greeley  
128 East Main Street, Suite 102  
Post Office Box 2981  
Rock Hill, South Carolina 29732  
(803) 329-0088 S.C. Bar # 7850  
Attorney for Respondent

November 6, 2017.

**LELAND B. GREELEY, P.A.  
ATTORNEY**

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November 6, 2017

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

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SC Court of Appeals

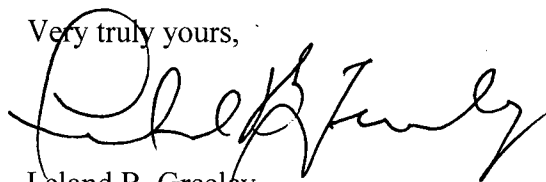
RE: The City of Rock Hill v. Anthony M. Ketchum,  
Appellate Case No. 2015-001817

Dear Ms. Kitchings:

Please find enclosed the original, along with 6 copies, of Respondent's Objection to Appellant's Motion to Return Remittitur., with a Certificate of Mailing for filing in your office. By copy of this letter, I am serving Counsel for the Appellant.

With kindest regards, I remain

Very truly yours,

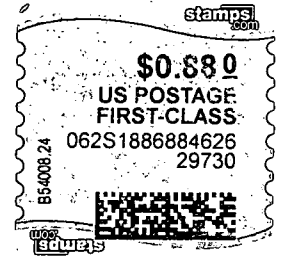


Leland B. Greeley

/adt  
Enclosures

cc: Christopher Edward Barton, Esquire

Leland B. Greeley, P.A.  
Post Office Box 2981  
Rock Hill, SC 29732



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