

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Beaufort County
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

Case No. 2017-CP-07-02636
Appeal No. 2018-001092

RECEIVED
JAN 18 2019
SC Court of Appeals

Joseph Holmes, as Personal Representative of the Estate of Mr. Holmes Holmes,

Respondent,

v.

Bayview Manor, LLC, d/b/a Bayview Manor, Epic Group, LP, and Epic General, LLC,

Appellants.

**CONSENT MOTION REQUESTING PERMISSION TO SERVE AND FILE
RESPONDENT'S FINAL BRIEF OUTSIDE OF THE FILING DEADLINE SET BY
RULE 211 OF THE SOUTH CAROLINA APPELLATE COURT RULES**

COMES NOW Respondent who moves with the consent of Appellants for an Order granting Respondent's request for permission to serve and file Respondent's final brief outside of the filing deadline set by Rule 211 of the South Carolina Appellate Court Rules. Respondent's motion is based on the following grounds:

1. On January 3, 2019, Respondent received Appellants' Final Brief.
2. On January 15, 2019, counsel for Respondent received a letter from the South Carolina Court of Appeals stating Respondent's final brief was past due, if Respondent intends to file the final brief outside of the deadline set by Rule 211 of the South Carolina Appellate Court Rules, Respondent must serve and file

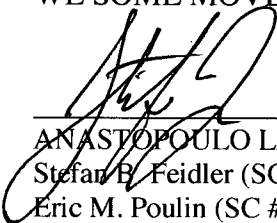
Respondent's final brief, along with a motion requesting permission to serve and file respondent's final brief outside of the deadline set by Rule 211 of the South Carolina Appellate Court Rules within ten (10) days.

3. On January 16, 2019, counsel for Appellants consented to Respondent's motion to request permission to serve and file Respondent's final brief outside of the filing deadline set by Rule 211 of the South Carolina Appellate Court Rules.

WHEREFORE Respondent, with the consent of Appellant, requests an order granting Respondent's request for permission to serve and file Respondent's final brief outside of the filing deadline set by Rule 211 of the South Carolina Appellate Court Rules.


WE SOME MOVE:

Dated this 17 of January, 2019


ANASTOPOULOU LAW FIRM, LLC
Stefan B. Feidler (SC #101918)
Eric M. Poulin (SC #100209)
Roy T. Willey, IV. (SC #101010)
32 Ann Street
Charleston, South Carolina 29403
Phone (843) 614-8888
Facsimile (843) 494-5536

Attorneys for the Respondent

WE SO CONSENT:


W. McElhaney White
Joshua T. Thompson
101 W. St. John Street, Suite 200
Spartanburg, SC 29304
(864) 594-5300

Attorneys for the Appellants

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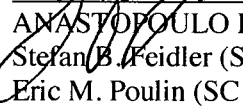
Bayview Manor, LLC, d/b/a Bayview Manor, Epic Group, LP, and Epic General, LLC,

Appellants.

PROOF OF SERVICE

I certify that I have served Respondent's Final Brief and Consent Motion requesting permission to serve and file the respondent's final brief outside of the filing deadlines set by Rule 211 of the South Carolina Appellate Court Rules on Appellants by depositing a copy of the same in the United States Mail, postage prepaid, on January 17, 2019, addressed to Appellants' attorney(s) of record, W. McElhaney White and Joshua T. Thompson, 101 W. St. John Street, Suite 200, Spartanburg, SC, 29304. I further certify that the Respondent's Final Brief is in compliance with Rule 211 of the South Carolina Appellate Court Rules on Appellants.

Dated this 17 of January, 2019


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32 Ann Street
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Attorneys for the Respondent

Counsel of Record for Appellants:

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L. CRAYTON WILLIAMS (SC)

*OF COUNSEL

Via FedEx

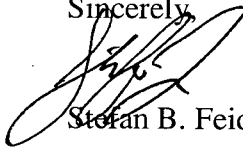
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: *Estate of David Holmes v. Bayview Manor et al.*
Case No.: 2017-CP-07-02636

Dear Sir/ Madame:

Enclosed please find the original and 15 copies of Respondent's Final Brief. We are also enclosing the Certificate of Service for the same and copying all Counsel of Record with the Respondent's Final Brief and the Record on Appeal. Also included, Consent Motion requesting to serve and file Respondent's Brief outside of the filing deadline. Please return a clocked copy of each in the envelope provided.

Sincerely,



Stefan B. Feidler

SBF/med

Enclosures: Respondent's Final Brief, Self- Addressed Envelope, Motion and \$25.00 Check

Cc: Joshua T. Thompson, Esq.

RECEIVED
JAN 18 2019
SC Court of Appeals

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North Charleston: 2170 Ashley Phosphate Road, 3rd Floor, North Charleston, South Carolina 29406 * **Greenville:** 418 River Street, Greenville, SC 29601

Florence: 150 W. Evans Street, Florence, South Carolina 29501 * **Myrtle Beach:** 2411 N. Oak Street, Suite 407, Myrtle Beach, South Carolina 29577

Columbia: 1201 Main Street, Suite 1100, Columbia, South Carolina 29201 * **Raleigh, NC:** 8801 Fast Park Drive, Suite 301, Raleigh, NC 27617

Wilmington, NC: Appointment Only