

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL from CHARLESTON COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2014-CP-10-04340
APPELLATE CASE NO.: 2018-001089

RECEIVED
MAR 11 2019
SC Court of Appeals

Gwendolyn Brown, individually, and as natural guardian of Qunintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons, Plaintiffs, Of Whom Gwendolyn Brown, , Deville Kiez, Haroldlett Uneke Simmons are the
.....Appellants,

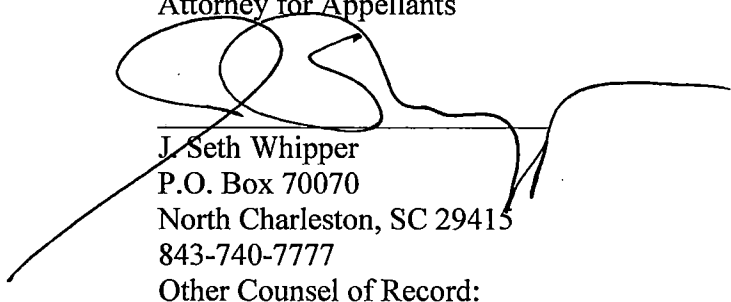
v.

Housing Authority of the City of Charleston, South
Carolina.....Respondent

MOTION TO REQUEST PERMISSION TO FILE APPELLANTS' REPLY BRIEF OUT OF
TIME

NOW comes Appellants to request permission to file their Reply Brief out of time. Counsel for Appellants has been involved with numerous filings in the trial courts and the S. C. Supreme Court. A Reply Brief and an Answer in other matters were due in the same period but the Reply herein was inadvertently calendared with the Record on Appeal in this matter which is due on March 14, 2019. The Reply Brief herein was due on February 22, 2019. This motion is based on the South Carolina Rules of Court and applicable law.

Attorney for Appellants



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Other Counsel of Record:

March 8, 2019

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THE STATE OF SOUTH CAROLINA

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Gwendolyn Brown, individually, and as natural guardian of Qunintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons, Plaintiffs, of whom Gwendolyn Brown, Deville Kiez Simmons, Haroldlett Uneke Simmons are the
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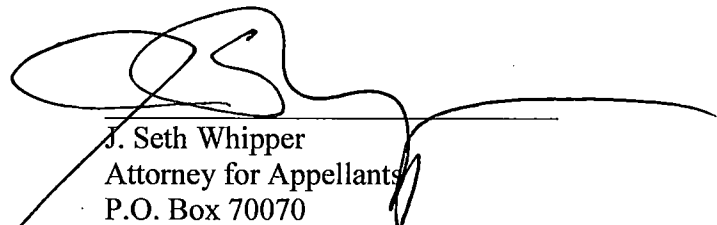
v.

Housing Authority of the City of Charleston, South
Carolina.....Respondent

PROOF OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Motion to Request Permission to file Appellants' Reply Brief Out of Time has been served upon opposing counsel and the clerk of court, The Honorable Jenny Abbott Kitchings on the 8th day of March, 2019 via: U.S. Postal Service.

March 8, 2019



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March 8, 2019

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MAR 11 2019

SC Court of Appeals

The Hon. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211-1629

Re: **Gwendolyn Brown, individually, and as natural guardian of Qunintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons, Plaintiffs, Of whom Gwendolyn Brown, Deville Kiez Simmons Haroldlett Uneke Simmons are the Appellants**
v.
Housing Authority of the City of Charleston, South Carolina, Respondent
Appellate Case No.: 2018-001089
Motion to Request Permission to File Appellants' Reply Brief Out of Time
- For Filing
Proof of Service- For Filing

Dear Ms. Kitchings:

Please find enclosed for filing, the Appellants' Motion to Request Permission to File Appellants' Reply Brief Out of Time. I am enclosing the original and (7) copies of the same for conforming. A check (#10482) in the amount \$50.00 for the requisite filing fee is also enclosed. I am providing a self-addressed stamped envelope for your use in returning the conformed copies.

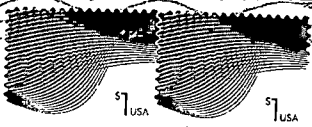
Sincerely,

WHIPPER LAW FIRM


J. Seth Whipper, Esq.

xc: Mary Bass Lohr, Esquire
Robert W. Achurch, III, Esquire
William Hewitt Cox, III, Esquire

CHARLESTON SC 294
FRI 08 MAR 2019 AM



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