

89700

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2016-CP-10-2230

The Housing Authority of the City of Charleston

Respondent

v.

Katrina Brown

Appellant

RECEIVED
MAY 01 2019
SC Court of Appeals

**MOTION TO FILE FEWER THAN FIFTEEN COPIES
OF THE RECORD ON APPEAL AND FINAL BRIEFS**

Appellant hereby moves for an Order permitting the parties to file no more than six copies of the Record on Appeal and Final Briefs. This motion is made upon the following grounds:

This appeal arises out of an action which Respondent filed on March 1, 2016 seeking to eject Appellant and her daughter from her apartment in a federally-subsidized low-income housing complex. Appellant is represented in this appeal by attorneys from two non-profit organizations, South Carolina Legal Services (“SCLS”) and the South Carolina Appleseed Legal Justice Center (“Appleseed”), whose mission is to advocate on behalf of low-income South Carolinians. Both organizations rely largely on grant funds and private donations to support their work and do not charge their clients attorney’s fees.

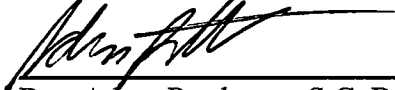
The Record on Appeal in this case is approximately one hundred and twelve pages and Appellant's Brief and Reply together are another fifty-eight pages. While this record is not exceedingly large, it is still costly to produce and would require Appellant's attorneys to expend limited resources which would otherwise be used to advocate for low-income families. Appellant herself is a low-income mother of two and cannot afford to pay these costs.

The undersigned has consulted with Respondent's counsel concerning this request and has been advised that Respondent consents to the requested relief on the condition that any relief granted apply equally to Respondent.

THEREFORE, Appellant hereby moves for an Order permitting the parties to file no more than six copies of the Record on Appeal and Final Briefs.

May 1, 2019

SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER


By: Adam Protheroe, S.C. Bar No. 78442
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113 ext. 106

SOUTH CAROLINA LEGAL SERVICES
Matthew M. Billingsley, S.C. Bar No. 76095
2803 Carner Avenue
Charleston, SC 29405
(843) 266-2174

Attorneys for Appellant

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2016-CP-10-2230

The Housing Authority of the City of Charleston

Respondent

v.

Katrina Brown

Appellant

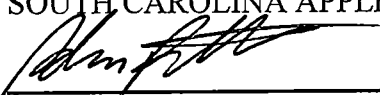
RECEIVED
MAY 01 2019
SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the MOTION TO FILE FEWER THAN FIFTEEN COPIES OF THE RECORD ON APPEAL AND FINAL BRIEFS on the Housing Authority of the City of Charleston by depositing a copy of it in the United States Mail, postage prepaid, on May 1, 2019, addressed to its attorney of record, Theodore Parker, III, Esq. Parker Nelson & Associates, CHTD. 211 King Street, Suite 107 Charleston, SC 29401.

SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER

May 1, 2019


By: Adam Protheroe, S.C. Bar No. 78442
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113 ext. 106

May 1, 2019

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED
MAY 01 2019
SC Court of Appeals

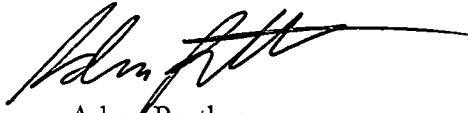
**RE: The Housing Authority of the City of Charleston v. Katrina Brown
Appellate Case No. 2018-002155**

Dear Ms. Kitchings:

Please find enclosed for filing Appellant's Motion to File Fewer than Fifteen Copies of the Record on Appeal and Final Briefs.

With kind regards, I am

Sincerely,



Adam Protheroe
Matthew M. Billingsley
Attorneys for Appellant

AP/

CC: Theodore Parker, III
Parker Nelson & Associates, CHTD.
211 King Street, Suite 107
Charleston, SC 29401