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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Paul M. Burch, Circuit Court Judge

Case No: 2017-CP-40-05538
Appellate Case No: 2018-002026

Pearlz Vista, Inc., d/b/a Pearlz
Oyster Bar, Carolina Ale
House Operating Company,
LLC, d/b/a Carolina Ale
House, and Art Bar, Inc.

Respondents,

RECEIVED

JUN 28 2019

SC Court of Appeals

v.

Latoria Cooks,

Appellant.

MOTION TO SERVE RESPONDENT'S INITIAL BRIEF AND
FILE THE PROOF OF SERVICE OUT OF TIME

Respondent CAROLINA ALE HOUSE OPERATING COMPANY, LLC, d/b/a
CAROLINA ALE HOUSE hereby makes this above-referenced Motion. Respondent asserts that
the filing and granting of this Motion will not prejudice the Appellant, and therefore respectfully
requests that the requested relief be granted.

(Signature page follows)



Robert D. Moseley, Jr. (SC Bar #64084)

Megan Early-Soppa (SC Bar # 101186)

Moseley Marcinak Law Group LLP

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Attorneys for Respondent

Carolina Ale House Operating Company, LLC

d/b/a Carolina Ale House

June 26, 2019

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Paul M. Burch, Circuit Court Judge

Case No: 2017-CP-40-05538
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Appellant.

PROOF OF SERVICE

I, the undersigned, as counsel for Respondent Carolina Ale House Operating Company, LLC, d/b/a Carolina Ale House, do hereby certify that I have on this date served the foregoing Motion to Serve Respondent's Initial Brief and File the Proof of Service Out of Time, on attorneys of record this 26th day of June, 2019, by depositing a copy of the same in the United States Mail, postage prepaid, addressed to:

Sarah P. Spruill
Haynsworth Sinkler Boyd
PO Box 2048
Greenville, SC 29602

John W. Carrig, Jr.
120 North Lake Drive
Lexington, SC 29071

Joseph M. McCulloch
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PO Box 11623
Columbia, SC 29211

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
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The Honorable Paul M. Burch, Circuit Court Judge

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Pearlz Vista, Inc., d/b/a Pearlz
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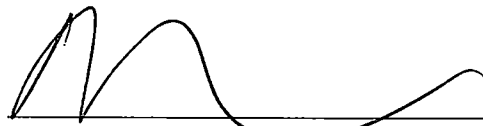
I, the undersigned, as counsel for Respondent Carolina Ale House Operating Company, LLC, d/b/a Carolina Ale House, do hereby certify that I have on this date served the foregoing Initial Brief of Respondent Carolina Ale House Operating Company, LLC, d/b/a Carolina Ale House and Designation of Matter to Be Included in the Record on Appeal on attorneys of record this 26th day of June, 2019, by depositing a copy of the same in the United States Mail, postage prepaid, addressed to:

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SC Court of Appeals

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

Re: Latoria R. Cooks v Perlz Vista, Inc. d/b/a Pearlz Oyster Bar,
Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House
and Art Bar, Inc.
Appellate Case No. 2018-002026

Dear Ms. Kitchings:

Enclosed for filing is the original and one copy of the following:

1. Respondent Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House's Initial Brief
2. Designation of Matter
3. Motion to File Out of Time
4. Proof of Service
5. Check in the amount of \$50.

Thank you for your consideration.

With best regards, I remain,

Very truly yours,

Robert D. Moseley, Jr.
Moseley Marcinak Law Group LLP

RDMjr:csb
Enclosures

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
June 26, 2019
Page 2

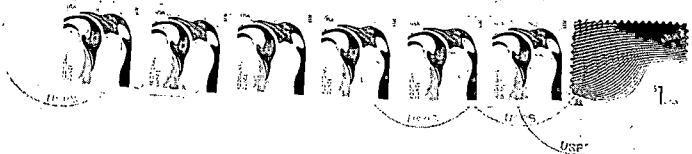
cc: John P. Riordan
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Attn: Karen Parker
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