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THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master in Equity

Case No.: 2016-CP-49-6794

RECEIVED
JUL 01 2019
SC Court of Appeals

Mathes Auto Sales, Inc.

Respondent/Appellant

v.

Otis Morris, Jr., Pro Bowl Motors, Inc., Travelers Casualty & Surety Co., of America, Inc.; Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC, Defendants, of whom Otis Moore, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC are the Appellants/Respondents.

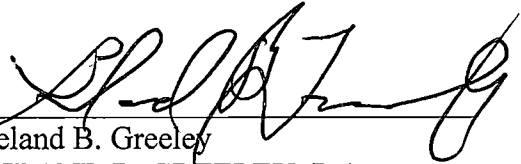
MOTION TO FILE INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN RECORD ON APPEAL OUTSIDE OF TIME

Dixon Automotive, LLC, Gerald Scott Dixon, and Michael Tyrone Moore do hereby move this Court to allow them to file the Initial Brief and the Designation of Matter to be Included in the Record outside of time.

Defendants had previously filed a motion for a 30 day extension in which to file these documents. Counsel for Defendant, through his error regarding the number of filing fees to be paid for the motion caused a delay in response to the motion. Counsel did believe that the extension, if granted would be to June 27. However, the letter granting the extension was received on Friday, June 28, 2019 and therefore counsel respectfully requests allowance of the filing of the Initial Brief and Designation of Matter to be Included in the Record on Appeal with this motion on the first business following

receipt of the letter. It is submitted that the ends of justice would be served in allowing the extension and that the Respondent is not prejudiced by such and extension.

July 1, 2019



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Other Counsel of Record:

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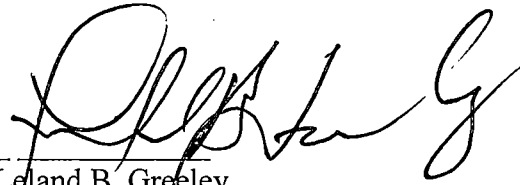
v.

Otis Morris, Jr., Pro Bowl Motors, Inc., Travelers Casualty & Surety Co., of America, Inc.; Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC, Defendants, of whom Otis Moore, Jr., Pro Bowl Motors, Inc., Gerald Scott Dixon, Michael Tyrone Moore, and Dixon's Automotive, LLC are the Appellants/Respondents.

PROOF OF SERVICE

I certify that I served a copy of Defendants Dixon Automotive, LLC, Gerald S. Dixon, and Michael T. Moore's Initial Brief, Designation of Matter to be Included in the Record on Appeal; Motion to File Outside of Time; and this Proof of Service on Mathes Auto Sales Inc. and Otis Morris, Jr. and Pro Bowl Motors, Inc. on July 1, 2019 by depositing a copy of it in the United States Mail, postage prepaid addressed to their attorneys of record, J. Gregory Studemeyer, Post Office Box 12201, Columbia, South Carolina 29211-2201 and H. Ronald Stanley, Post Office Box 7722, Columbia, South Carolina 29202.

July 1, 2019



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July 1, 2019

HAND DELIVERED

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

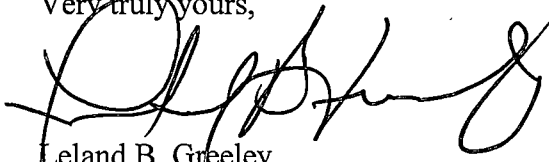
RE: Mathes Auto Sales, Inc. v. Otis Morris, Jr, et al..
22019-000297

Dear Ms. Kitchings:

Please find enclosed the original and a copy of Appellants' Dixon, Moore, and Dixon Automotive, LLC Motion to File Outside of Time; the motion fee of \$50.00; as well as the Initial Brief, Designation of Matter to be Included in Record on Appeal, and the Proof of Service on opposing counsel.

With kindest regards, I remain

Very truly yours,



Leland B. Greeley

Enclosures

cc: J. Gregory Studemeyer; H. Ronald Stanley

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