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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

RECEIVED
AUG 27 2019
SC Court of Appeals

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

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 PROOF OF SERVICE OF THE RECORD
ON APPEAL OUTSIDE OF FILING DEADLINE

NOW comes Appellants to request permission to file their Proof of Service of the Record on Appeal outside of the filing deadlines.

Appellants' conformed copies of their Amended Initial Brief and the Amended Designation of Matter were received in our office on the same day as Respondent's Amended Initial Brief and Amended Designation of Matter. (See Attached). Through inadvertence, Respondent's mailing was attached to the underside of the Appellants' mailing and placed in a file holding Appellants' correspondence. Appellants' first notice of the filing of Respondent's Amended Initial Brief and Amended Designation of Matter was August 16, 2019 by letter of the Deputy Clerk for the S. C. Court of Appeals.

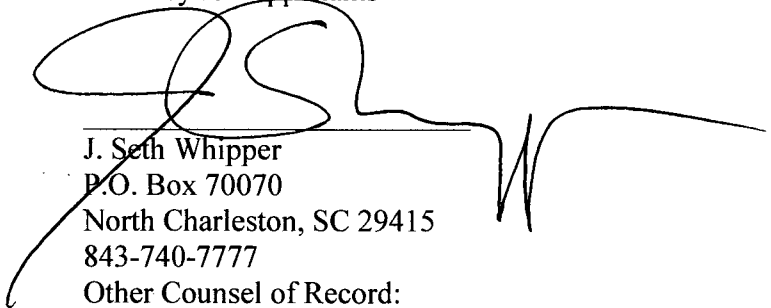
Appellants have filed the Proof of Service of the Record on Appeal in this matter and move for permission to file the Proof of Service of the Record of Appeal outside of the filing deadlines set by Rule 210, SCACR.

This motion is based on the South Carolina Rules of Court and Applicable law.

Signature on Next Page

Attorney for Appellants

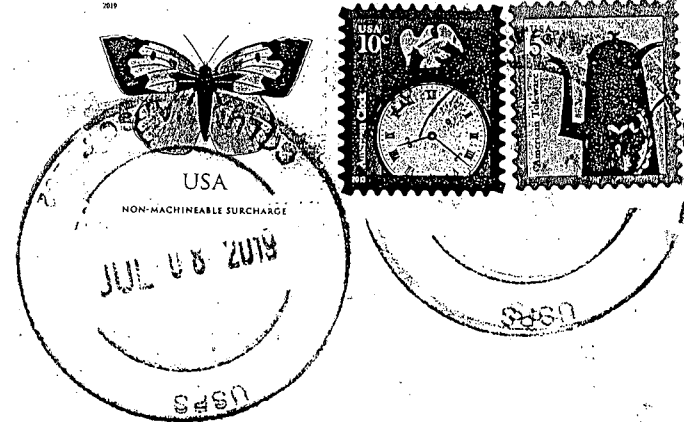
August 26, 2019



J. Seth Whipper
P.O. Box 70070
North Charleston, SC 29415
843-740-7777
Other Counsel of Record:

Mary Bass Lohr
Robert W. Achurch, III
William H. Cox, III
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843/522-2400
Attorneys for Respondent

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North Charleston, SC 29415



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RESERVED
JUL 11 2019

BY _____

WHIPPER LAW FIRM

Attorneys and Counselors at Law

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JUL 05 2019

SC Court of Appeals

CHERYL WHIPPER HAMILTON
J. SETH WHIPPER

MAILING ADDRESS
POST OFFICE BOX 70070
NORTH CHARLESTON, SC 29415

July 2, 2019

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

U.S MAIL ONLY

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
Appellants' Amended Initial Brief- For Filing
Amended Designation of Matter- For Filing
Proof of Service- For Filing

Dear Ms. Kitchings:

Find enclosed an original and one copy of the following: Appellants' Amended Initial Brief, Amended Designation of Matter, and the Proof of Service for the same. Find enclosed a self-addressed, stamped envelope for the return of all copies.

By copy of this letter, I am serving the same on Robert W. Archurch, III, Esq., William H. Cox, III, Esq. and Mary Bass Lohr, Esq., attorneys for Respondent.

Sincerely,
WHIPPER LAW FIRM

J. Seth Whipper, Esquire

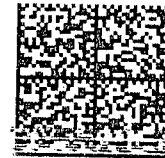
Enclosure

JSW/lds

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

Howell, Gibson & Hughes, P.A.
Post Office Box 40
Beaufort, SC 29906
MBL

CHARLESTON
SC 294
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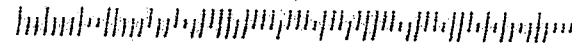


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Whipper Law Firm
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Of Counsel

* Certified Mediator

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July 8, 2019

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

Re: Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons vs. Housing Authority of the City of Charleston, South Carolina
2014-CP-10-043
Civil Action No.: 2018-001089
Our File No: 11845 MBL

Dear Ms. Kitchings:

Please find enclosed herewith for filing *Amended Initial Brief of Respondent* and *Amended Designation of Matter* with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.

Mary Bass Lohr
MBL/ad
Enclosure

cc: J. Seth Whipper ✓

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P
Y

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

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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,

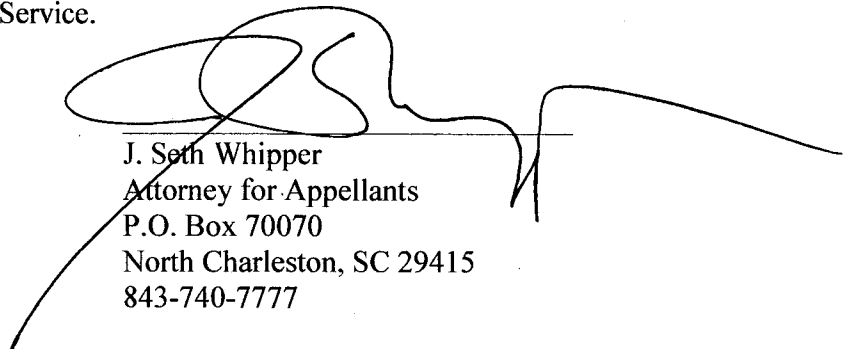
Of whom Gwendolyn Brown, Deville Kiez Simmons, Haroldlett Uneke Simmons are the
.....Appellants

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 Proof of Service of the Record on Appeal Outside of Filing Deadlines has been served upon opposing counsel and the clerk of court, The Honorable Jenny Abbott Kitchings on the 26th day of August, 2019 via: U.S. Postal Service.



J. Seth Whipper
Attorney for Appellants
P.O. Box 70070
North Charleston, SC 29415
843-740-7777

Other Counsel of Record:
Mary Bass Lohr
Robert W. Achurch, III
William H. Cox, III
Post Office Box 40
Beaufort, SC 29901
Attorneys for Respondent

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Attorneys and Counselors at Law

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CHERYL WHIPPER HAMILTON
J. SETH WHIPPER

MAILING ADDRESS
POST OFFICE BOX 70070
NORTH CHARLESTON, SC 29415

August 26, 2019

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' Proof of Service of the Record on Appeal Outside for the Filing Deadlines – For Filing Proof of Service- For Filing

Dear Ms. Kitchings:

Please find enclosed for filing, the Appellants' Motion to Request Permission to File Appellants' Proof of Service of the Record on Appeal Outside of the Filing Deadlines. I am enclosing the original and (7) copies, (1) for conforming. Also, enclosed is Check **#10584** in the amount \$50.00 for the requested filing fee. I am providing a self-addressed stamped envelope for your use in returning the conformed copy.

RECEIVED

AUG 27 2019

SC Court of Appeals

Sincerely,
WHIPPER LAW FIRM

J. Seth Whipper, Esq.

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