

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

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

.....Appellants,

v.

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

Respondent

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SC Court of Appeals

MOTION TO REQUEST PERMISSION TO SERVE AND FILE APPELLANTS' FINAL
BRIEF OUTSIDE OF FILING DEADLINE

NOW come Appellants to request permission to serve and file Appellants' Final Brief outside of the filing deadlines set by Rule 211 of the SCACR.

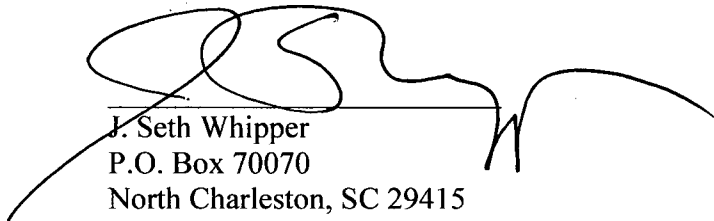
In September 2019, counsel for Appellants, during inquiry on the status of this matter, did not understand that waiting for the Court's instruction on when to complete the filings could subject the appeal to dismissal.

Appellants have served and filed their Final Brief, Certificate of Counsel, and Proof of Service of the same in the manner provided in Rule 211, except for the time.

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

Attorney for Appellants

October 9, 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
Post Office Box 40
Beaufort, SC 29901
843/522-2400
Attorneys for Respondent

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
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Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons; Gwendolyn Brown, Haroldlett Uneke Simmons, Deville Kiez Simmons Plaintiffs,

Of Whom Gwendolyn Brown, Deville Kiez Simmons, Haroldlett Uneke Simmons.....Appellants

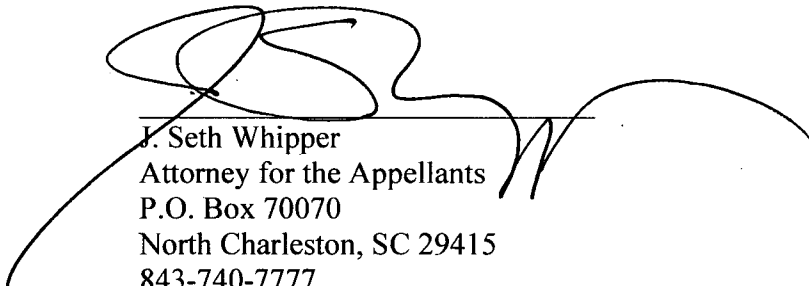
v.

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

PROOF OF SERVICE

The undersigned hereby certifies that the true copy of the foregoing Appellants' Final Brief, Motion to Request Permission to Serve and File Appellants' Final Brief Outside of Filing Deadline, and Certificate of Counsel have been served on the South Carolina Court of Appeals by depositing a copy to them in the United States Mail, postage prepaid, on October 9, 2019, addressed to Clerk, South Carolina Court of Appeals, Post Office Box 11629, Columbia, South Carolina 29211 and served the same on: Mary Bass Lohr, Robert W. Achurch, III, and William H. Cox, III, Attorneys for Respondent, Post Office Box 40 Beaufort, SC 29901.

October 9, 2019



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October 9, 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 Quintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons, Plaintiffs,**

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

v.

**Housing Authority of the City of Charleston, South Carolina, Respondent
Appellate Case No.: 2018-001089**

**Motion to Request Permission to Serve and File Appellants' Final Brief
Outside of Filing Deadline- For Filing
Proof of Service- For Filing**

Dear Ms. Kitchings:

Please find enclosed for filing, the Appellants' Motion to Request Permission to File Appellants' Final Brief Outside of Filing Deadline and Proof of Service. I am enclosing the original and (7) copies, (1) for conforming. Also, enclosed is Check **#10601** 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.

By copy of this letter, I am serving the same on Mary Bass Lohr, Robert W. Achurch, William H. Cox, Counsels for Housing Authority of the City of Charleston.

Sincerely,
WHIPPER LAW FIRM

J. Seth Whipper, Esq.

Enclosure
xc: Gwendolyn Brown (w/o encl.)

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