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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

RECEIVED

WCC File No. 1116698  
Appellate Case No. 2018-001294

FEB 07 2020  
SC Court of Appeals

Ex Parte: Robert Horne, as Personal  
Representative of the Estate of Gus A. King,  
And Laura King ..... Appellants,

In Re: Gus A. King, Claimant ..... Appellant,

v.

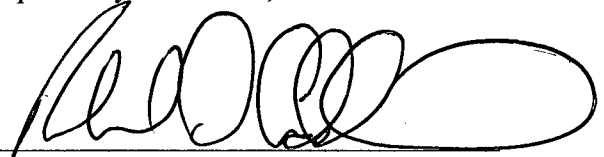
Pierside Boatworks, Employer,  
and PA Manufacturers Assn. Ins. Co., Carrier, ..... Respondents.

**MOTION FOR PERMISSION TO FILE RESPONDENTS' FINAL BRIEF**

Pursuant to Rule 240, SCACR, respondents move before the South Carolina Court of Appeals for permission to file Respondents' final brief on appeal outside the deadline set by Rule 211 of the South Carolina Appellate Court Rules. Rule 211 requires that each party shall file their final brief within twenty (20) days after service of the Record on Appeal. Counsel for Respondents were unaware of receipt and service of the Record on Appeal due to a misunderstanding by a new staff member resulting in the misfiling of the documents. Respondents are working to prepare their final brief as quickly as possible now that the Record on Appeal has been located.

Based on the foregoing, Respondents respectfully request permission of this Court to file Respondents' final brief outside the deadline set by SCACR Rule 211.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Daniel Addison', written over a horizontal line.

R. Daniel Addison #6793  
ADDISON LAW GROUP, LLC  
Post Office Box 7637  
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(803)764-2030 (facsimile)  
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Attorney for Respondents Pierside  
Boatworks and PA Manufacturers Assn. Ins.  
Co.

February 7, 2020

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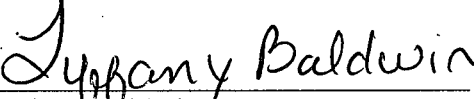
**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellants with a copy of the Motion for Permission to File Respondents' Final Brief by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

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Tiffany Baldwin  
Paralegal to R. Daniel Addison

February 7, 2020

R. Daniel Addison

\*Meg Donahue  
\*Of Counsel

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## ADDISON LAW GROUP, LLC

February 7, 2020

VIA HAND DELIVERY

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC. 29201

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SC Court of Appeals

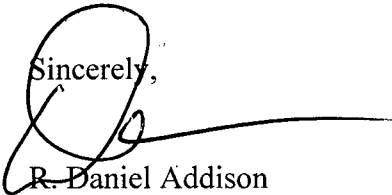
RE: **Gus A. King v. Pierside Boatworks**  
**Appellate Case No. 2018-001294**

Dear Ms. Kitchings:

Please find enclosed for filing the original *Motion For Permission To File Repondents' Final Brief* one (1) Copy *Motion For Permission To File Repondents' Final Brief* in regard to this case.

Thank you for your assistance in this matter. If you should have any questions, please feel free to contact me.

Sincerely,

  
R. Daniel Addison  
Addison Law Group, LLC

RDA/

Enclosure

Cc: J. Gary Christmas, Esquire  
Paul Doolittle, Esquire  
Allison P. Sullivan, Esquire