

92985

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Benjamin Culbertson, Circuit Court Judge

RECEIVED

JUL 22 2020

SC Court of Appeals

Case No. 2017-CP-26-05913

John Kennedy,Appellant,

v.

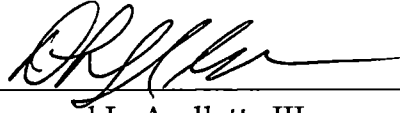
Myrtle Beach Police Department
Amy Prock, Angela Kegler, and
John Pedersen,Respondents.

MOTION TO FILE OUT OF TIME

The respondents hereby move for permission to serve and file their Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal outside of the filing deadlines set by Rules 208 and 209, SCACR.

(Signature page follows)

Respectfully submitted,



Derwood L. Aydlette III
T. Foster Haselden
Gignilliat, Savitz & Bettis, L.L.P.
900 Elmwood Avenue, Suite 100
Columbia, South Carolina 29201
(803) 799-9311
Attorneys for Respondents

July 22, 2020

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY
Benjamin Culbertson, Circuit Court Judge

Case No. 2017-CP-26-05913

RECEIVED
JUL 22 2020
SC Court of Appeals

John Kennedy,

Appellant,

v.

Myrtle Beach Police Department
Amy Prock, Angela Kegler, and
John Pedersen,

Respondents.

PROOF OF SERVICE

I hereby certify that I have this day caused to be served a copy of the **Final Brief of Respondent, Respondent's Designation Of Matter to be Included in the Record on Appeal, and Motion to File Out of Time** on counsel of record by deposit in the United States mail, first-class postage prepaid, addressed to:

Donald Gist
Aaron Wallace
Gist Law Firm, PA
4400 North Main Street
Columbia, SC 29203

Date: July 22, 2020

Amber Parshue
Legal Assistant



GIGNILLIAT SAVITZ & BETTIS LLP

STEPHEN T. SAVITZ**
LINDA PEARCE EDWARDS*
DERWOOD L. AYDLETTE III**
CHRISTOPHER W. JOHNSON*
R. HAYNE HODGES III
FRED A. WILLIAMS*
T. FOSTER HASELDEN
L. MARSHALL COLEMAN NEWTON

*CERTIFIED SPECIALIST
LABOR & EMPLOYMENT LAW
†CERTIFIED MEDIATOR

RECEIVED

JUL 22 2020

SC Court of Appeals

VANCE J. BETTIS+
OF COUNSEL

JULIAN H. GIGNILLIAT
(1939-2002)

Sender's email address:
apardue@gsblaw.net

July 22, 2020

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate Street
Columbia, SC 29211

Kennedy v. City of Myrtle Beach Police Department, et al.
Civil Action No. 2017-CP-26-05913
Appellate Case No.: 2019-001556

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Respondents' Motion to File Out of Time, Initial Brief of Respondents, Respondents' Designation of Matter to be Included in the Record on Appeal, and a Proof of Service, along with a check in the amount of \$50.00 for the filing fee for the above-referenced action. Please file the original and return the clocked copy to my courier.

With highest regards,

Respectfully,

Amber Pardue
Paralegal

DLA/ap

Enclosure

cc: Donald Gist, Esquire (w/encl)
Aaron Wallace, Esquire (w/encl)