

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from the South Carolina Administrative Law Court

Milton V. Kimpson, Presiding Judge

Appellate Case No. 2019-001800

RECEIVED

Aug 19 2020

SC Court of Appeals

Habibunnisa Begum.....Respondent,

v.

Florence County Tax Assessor.....Appellant

**MOTION FOR LEAVE TO SERVE AND FILE FINAL BRIEF  
OUT OF TIME**

Counsel for the respondent moves for leave of this court to serve and file the respondent’s final brief two days out of time, on the following grounds.

Counsel for the respondent are solo or small firm practitioners with active trial and appellate practices. In the press of business, counsel passed the time for filing the final brief reflecting insertions in the brief with references to the final record. This was due in no small part to the disruption of business occasioned by the COVID-19 pandemic. No prejudice will inure to the Appellant if this motion is granted and the Respondent’s final brief, which is filed concurrently herewith, is accepted and treated as timely.

Counsel therefore respectfully requests leave to serve and file the respondent’s final brief two days out of time.

Respectfully submitted,

/s/ Andrew S. Radeker

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Attorneys for Respondent

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PROOF OF SERVICE

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I certify that I served the foregoing motion for extension in this case by providing a copy of it by email to opposing counsel at the email address shown below and on the date shown below:

D. Malloy McEachin, Jr., Esq.  
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Respectfully submitted,

/s/ Andrew S. Radeker

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August 19, 2020