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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SEP 10 2020

SC Court of Appeals

Honorable L. Casey Manning, Circuit Court Judge

Civil Action Case No. 2018-CP-40-01224
Appellate Case No. 2020-000550

Kevin L. PaulAppellant,

v.

Kevin L. Paul vs. Walmart Stores East, L.P.: Wal-Mart Supercenter,
d/b/a Wal-Mart Store 1339; and Richland County Sheriff's Office.....Respondent.

MOTION TO FILE FINAL REPLY BRIEF OF THE APPELLANT
OUT OF TIME

Patrick J. McLaughlin
Wukela Law Firm
P.O. Box 13057
Florence, SC 29504-3057
T: 843-669-5150

Appellant, Kevin L. Paul, moves this Court, pursuant to Rule 224 of the South Carolina Appellate Rules, for an Order permitting the filing and service of the Appellant's Final Reply Brief on the following grounds:

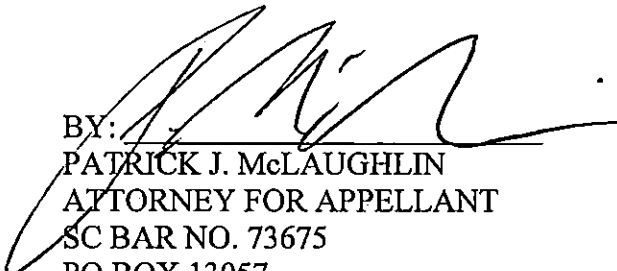
1. Appellant timely filed an Initial Brief on April 29, 2020, and timely filed an Initial Reply Brief in this matter on July 14, 2020.
2. On August 27, 2020, Appellant filed the Record on Appeal in this matter.
3. Appellant timely filed his Final Brief on August 26, 2020, however, through inadvertence or error, the Final Reply Brief was not timely filed.
4. On September 8, 2020, Appellant filed his Final Reply Brief with the Court of Appeals.
5. Appellant respectfully requests this Honorable Court permit the late filing and service of the Appellant's Final Reply Brief dated September 8, 2020.
6. Appellant believes that no harm would be caused to the Respondents by the granting of this Motion arising from the facts set out above and would further result in justness and fairness to the parties.

Respectfully submitted,

Florence, South Carolina

September 8, 2020

WUKELA LAW FIRM

BY: 
PATRICK J. McLAUGHLIN
ATTORNEY FOR APPELLANT
SC BAR NO. 73675
PO BOX 13057
FLORENCE SC 29504
843-669-5634

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Honorable L. Casey Manning, Circuit Court Judge

Case No. 2018-CP-40-01224

Kevin L. PaulAppellant,

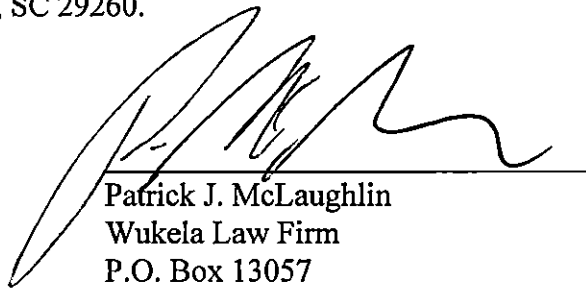
v.

Walmart Stores East, L.P.: Wal-Mart Supercenter, d/b/a
Wal-Mart Store 1339; and Richland County Sheriff's Office, Defendants,

Of Which Richland County Sheriff's Office is the.....Respondent,

PROOF OF SERVICE

I certify that I have served the Motion To File Final Reply Brief of the Appellant Out of Time on the Defendant/Respondent by depositing a copy of it in the United States Mail, postage prepaid, on September 08, 2020, addressed to its attorney of record, Andrew F. Lindemann; Lindemann, Davis & Hughes, P.O. Box 6923, Columbia, SC 29260.



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WUKELA LAW FIRM

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September 8, 2020

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SC Court of Appeals

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

Re: Kevin L. Paul vs. Walmart Stores East, L.P.: Wal-Mart Supercenter, d/b/a Wal-Mart
Store 1339; and Richland County Sheriff's Office
Civil Action Case No. 2018-CP-40-01224
Appellate Case No. 2020-000550

Dear Ms. Kitchings:

Please find enclosed herewith for filing with the South Carolina Court of Appeals:

1. Motion To File Final Reply Brief of The Appellant Out of Time and Proof of Service;
2. Final Reply Brief of the Appellant and Proof of Service;
3. Check in the Amount of \$50.00.

Please find a self-addressed stamped return envelope for your convenience in returning a copy of the Proof of Service to me.

Yours truly,

WUKELA LAW FIRM


PATRICK J. MCLAUGHLIN

S.C. Bar No. 73675
Attorney for Appellant

PJM:pkz
Enclosures

cc: Andrew F. Lindemann
Lindemann, Davis & Hughes
P.O. Box 6923
Columbia, SC 29260
Attorneys for Respondent



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SC Court of Appeals

First Class Mail

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

