

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

RECEIVED
Oct 05 2020
SC Court of Appeals

Appellate Case No.: 2020-000723

Frederick Nelson, Employee, Respondent,

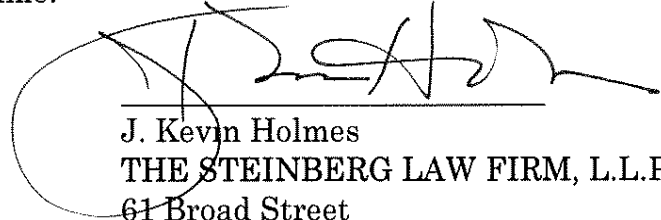
v.

City of North Charleston, Employer
And Carrier, Appellants.

MOTION TO FILE FINAL BRIEF OF RESPONDENT OUT OF TIME

The Respondent hereby moves to file the Final Brief of Respondent out of time. This motion is based on the grounds the Initial Brief of Respondent and additional designations of matters to be included in the Record on Appeal were timely filed by the undersigned on August 5, 2020. The Record on Appeal was electronically served on Malcolm M. Crosland, Jr., on August 13, 2020. The undersigned was not copied on the filing or service of Record on Appeal or Appellant's Final Brief. Respondent's Final Brief was due on August 23, 2020. The Clerk advised Malcolm M. Crosland, Jr., of the filing deficiency on September 30, 2020. Respondent's Final Brief was served and

filed electronically on October 1, 2020. A Certificate of compliance with Rule 211(a), SCACR, is being filed with this motion. Wherefore, the Respondent moves to be allowed to file his Final Brief out of time.

A handwritten signature in black ink, appearing to read 'J. Holmes', is written over a horizontal line. The signature is stylized and somewhat cursive.

J. Kevin Holmes
THE STEINBERG LAW FIRM, L.L.P.
61 Broad Street
Post Office Box 9
Charleston, South Carolina 29402

Charleston, South Carolina

October 5, 2020

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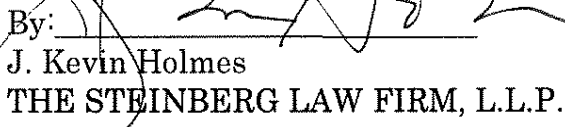
Frederick Nelson, Employee, Respondent,

v.

City of North Charleston, Employer
And Carrier, Appellants.

RULE 211(a) CERTIFICATE

The Respondent hereby certifies the Final Brief of Respondent
complies with Rule 211(b), SCARC.

By: 
J. Kevin Holmes
THE STEINBERG LAW FIRM, L.L.P.
61 Broad Street
Post Office Box 9
Charleston, South Carolina 29402

Charleston, South Carolina

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Frederick Nelson, Employee, Respondent,

v.

City of North Charleston, Employer
And Carrier, Appellants.

PROOF OF SERVICE

I hereby certify I have served a copy of the Rule 211 (a), SC ACR certificate and Respondent's Motion to File Final Brief of Respondent Out of Time on opposing counsel of record, Johnnie W. Baxley, Willson Jones Carter & Baxley, PA by depositing a copy in the United States mail, postage prepaid addressed to him at his address of record 421 Wando Park Boulevard, Suite 100, Mount Pleasant, SC 29464.

Glenis M. Haynes
Glenis M. Haynes
Paralegal to J. Kevin Holmes
THE STEINBERG LAW FIRM, L.L.P.
61 Broad Street
Post Office Box 9
Charleston, South Carolina 29402

Charleston, South Carolina
October 5, 2020

DAVID T. PEARLMAN
J. KEVIN HOLMES
THOMAS M. WHITE
MALCOLM M. CROSLAND, JR.
STEVEN E. GOLDBERG
MICHAEL J. JORDAN
BENJAMIN W. AKERY



CATHERINE D. MEEHAN
KELLY M. ALFREDS
F. ELLIOTTE QUINN, IV
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IRVING STEINBERG (1902-1980)

61 Broad Street | P.O. Box 9 | Charleston | SC | 29401 | (843) 720-2800 | (843) 722-1190 fax | steinberglawfirm.com

October 5 2020

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Fredrick Nelson v. City of North Charleston*
Appellate Case No.: 2020-000723

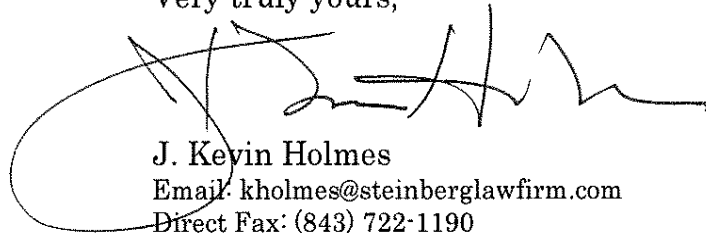
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Dear Ms. Kitchings,

Enclosed for filing please find a Rule 211 (a), SC ACR certificate together with a Motion for Leave to File Final Brief of Respondent out of Time, Proof of Service on opposing counsel, and a filing fee of \$50.00.

With kindest regards, I am

Very truly yours,



J. Kevin Holmes
Email: kholmes@steinberglawfirm.com
Direct Fax: (843) 722-1190

JKH/gmh
Enclosures
cc: Johnnie W. Baxley (via US Mail)

DAVID T. PEARLMAN
 J. KEVIN HOLMES
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Oct 05 2020

SC Court of Appeals

TO: The Honorable Jenny Abbot Kitchings
 FIRM: Clerk of Court, SC Court of Appeals
 FAX NO.: (803) 734-1839
 FROM: Glenis M. Haynes, Paralegal to J. Kevin Holmes, Esquire
 DATE: October 5, 2020
 RE: Frederick Nelson v. City of North Charleston
 Appellate Case No.: 2020-00723
 Motion for Leave to File Final Brief Out of Time

CONFIRMING COPY BY MAIL: Yes X

No

NUMBER OF PAGES (including cover sheet) 7

TRANSMITTED BY: gmh

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