

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
Court of General Sessions

Daniel Dewitt Hall, Circuit Court Judge

**RECEIVED**

**Oct 16 2020**

**SC Court of Appeals**

Appellate Case No. 2020-000184

The State of South Carolina

Respondent

Vs.

Ramona Gales,

Appellant,

MOTION FOR LEAVE TO FILE INITIAL BRIEF OF APPELLANT AND DESIGNATION  
OF MATTERS ON APPEAL

The Appellant hereby moves for permission to file the Initial Brief of Appellant and Designation of Matters to be Included on Appeal late. Appellant filed a motion for a 30 day extension of time to file the Initial Brief of Appellant and Designation of Matters to be Included on Appeal on or about August 3, 2020. That motion was grant on or about August 11, 2020. However, counsel for Appellant failed to enter the new deadline into his case manage system. Counsel would have filed a second motion for extension of time due the volume of counsel's workload and the amount of time counsel and counsel's assist were out due to COVID-19 related issues. Counsel's failure to timely file the Initial Brief of Appellant and Designation of Matters to be Included on Appeal was not intentional nor done for delay, but inadvertent. Furthermore, Appellant believes that Respondent is not prejudice by this late filing.

As a result, Appellant, by and through counsel, respectfully requests permission to file the Initial Brief of Appellant and Designation of Matters to be Include on Appeal outside of the original deadline.

Florence, SC

October 16, 2020

/s/ Thurmond Brooker

Thurmond Brooker, Esq.  
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CERTIFICATE OF MAILING

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The undersigned hereby certifies that a true copy of **Initial Brief of Appellant; Appellant's Designation of Matters to be Included on Appeal; and Appellant's Motion for Leave to File Initial Brief of Appellant and Designation of Matters to be Included on Appeal** was served on the following by email on this 16<sup>th</sup> day of October addressed as follows:

Alan Wilson, AIS Email Address: [awilson@scag.gov](mailto:awilson@scag.gov)

William M. Blich, Jr., AIS Email Address: [wblitch@scag.gov](mailto:wblitch@scag.gov)

Florence, SC

October 16, 2020

s/ *Thurmond Brooker*

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Attorney for Appellant