

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

**APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas**

**R. Scott Sprouse, Circuit Court Judge**

**RECEIVED**

**Nov 09 2020**

**SC Court of Appeals**

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**Case No. 2017-CP-04-02296  
Appellate Case No. 2019-000557**

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Vicki Littlefield ..... Respondent

v.

Paul W. Cromer, Jr., individually and d/b/a Paul Cromer, Inc. ....Appellant.

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**MOTION TO FILE OUT OF TIME**

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Paul W. Cromer, Jr., individually and d/b/a Paul Cromer, Inc., hereby moves the Court for an Order allowing him to file his Initial Reply Brief Out of Time. Appellant would show the Court that his Reply Brief was due on October 26, 2020 and that Appellant believed he submitted his Reply Brief electronically on that date. However, in preparing documents for the Record on Appeal Appellant noted that he had not received a clocked copy of the Reply Brief and determined that his submission was not properly sent. Appellant has attempted to communicate with opposing counsel regarding this issue but has been unable to consult with counsel. Appellant would further show that preparation of the Record on Appeal is underway and no additional extensions are anticipated as to remaining filings.

November 9, 2020

PRUITT & PRUITT

s/ Joshua B. Raffini  
Joshua B. Raffini  
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Attorney for Appellant

Other Counsel of Record:  
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Meliah Bowers Jefferson  
Wallace K. Lightsey

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

Steven C. Kirven, Master in Equity

Case No. 2016-CP-04-00443  
Appellate Case No. 2020-000890

RECEIVED

Nov 09 2020

SC Court of Appeals

Vicki Littlefield ..... Respondent

v.

Paul W. Cromer, Jr., individually and d/b/a Paul Cromer, Inc. ....Appellant.

**PROOF OF SERVICE**


I certify that I have served the **Motion File Out of Time and Initial Reply Brief** by depositing a copy of it in the United States Mail, postage prepaid, November 9, 2020, as well as serving by electronic mail, with mailed copies addressed as follows:

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November 9, 2020

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