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Feb 19 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2020-001144

Kierra Johnson,.....Appellant,

v.

Greenville County, Greater Greenville Sanitation District, the South Carolina
Department of Transportation, American Southern Insurance Company, and the
State Fiscal Accountability Authority,.....Defendants,

Of whom American Southern Insurance Company is the.....Respondent.

**MOTION TO FILE AMENDED BRIEF
OUTSIDE OF FILING DEADLIES**

The appellant respectfully requests that the Appellate Court grant the appellant leave to file her revised brief outside of the filing deadlines. The Court granted Respondent’s Motion to Strike Material Designated by Appellant for Inclusion in the Record on Appeal and ordered the appellant to serve and file an amended initial brief that excludes any references to the stricken items on January 22, 2021. The appellant apologizes to the court for her failure to file this revised brief in a timely manner.

For the foregoing reason(s), the appellant respectfully requests the Appellate Court grant appellant’s Motion to File Amended Brief Outside of Filing Deadlines.

Respectfully submitted,

s/ *Joshua T. Hawkins*

Joshua T. Hawkins, S.C. Bar #78470

Helena L. Jedziniak, S.C. Bar #100825

Hawkins & Jedziniak, LLC

1225 South Church Street

Greenville, South Carolina 29605

(864) 275-8142 (telephone)

(864) 752-0911 (facsimile)

josh@hjllesc.com

helena@hjllesc.com

Attorneys for Appellant

Greenville, South Carolina

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PROOF OF SERVICE

I certify that I have served a copy of the Appellant’s Motion to File Amended brief
Outside of Filing Deadlines, electronically to the Court of Appeals, and to the following attorney
of record for the Respondent to the following electronic addresses, on this date February 19,
2021.

Andrew F. Lindemann
James M. Davis, Jr.
LINDEMANN, DAVIS & HUGHES, P.A.
andrew@ldlawsc.com
jim@ldlawsc.com

s/ Joshua T. Hawkins
Joshua T. Hawkins, SC Bar #78470
Helena Jedziniak, SC Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
(864) 275-8142
josh@hjllesc.com
helena@hjllesc.com
Attorneys for Appellant

Hawkins & Jedziniak, LLC

1225 South Church Street
Greenville, South Carolina 29605
Telephone: (864) 275-8142
Facsimile: (864) 752-0911
josh@hjlsc.com
helena@hjlsc.com

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-via electronic filing/service: ctappfilings.com-
Ms. Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals

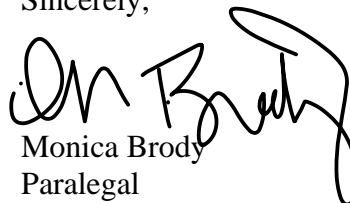
Re: *Kierra Johnson v. Greenville County, Greater Greenville Sanitation District, the South Carolina Department of Transportation, American Southern Insurance Company, and the State Fiscal Accountability Authority*
App. Case No.: 2020-001144

Dear Ms. Kitchings:

Please find enclosed for filing Appellant's Motion to File Amended Brief Outside of filing Deadlines, along with a Proof of Service upon Respondent.

Should you need anything further, please do not hesitate to contact our office.

Sincerely,


Monica Brody
Paralegal

Enclosures

CC:
Andrew F. Lindemann
James M. Davis, Jr.
LINDEMANN, DAVIS & HUGHES, P.A.
andrew@ldlawsc.com
jim@ldlawsc.com