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Mar 22 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Appeal from Colleton County and Dorchester County
Court of Common Pleas

Patrick R. Watts, Special Referee

Appellate Case No. 2020-001489

John Murray Gibbs,

Respondent,

v.

Henderson Gibbs, Jr.,

Appellant.

**RESPONDENT’S MOTION FOR PERMISSION TO SERVE AND
FILE INITIAL BRIEF AND DESIGNATION OF MATTER OUTSIDE
OF TIME**

Respondent, by and through undersigned Counsel, hereby moves the Court for permission to serve and file Respondent’s Initial Brief and Designation of Matter Outside of Time. This Motion is submitted pursuant to the instruction of the Clerk of Court dated March 10, 2021, allowing Respondent to serve and file the same within ten days of the date of the Clerk’s letter, the tenth date therefrom falling on Saturday, March 20, 2021, thereby requiring the service and filing of the within Motion, Initial Brief and

Designation of Matter for Inclusion to be served and filed no later than March 22, 2021, pursuant to Rule 263, SCACR. This Motion is not interposed for delay, and is submitted in good faith upon the permissive and remedial directive of the Court.

Respectfully submitted,

March 22, 2021

s/ Andrew T. Shepherd
Andrew T. Shepherd, Esquire
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S.C. Bar No. 76859
Counsel for Respondent

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I certify that I served a copy of Respondent's Motion for Permission to Serve and File Initial Brief and Designation of Matter to be Included in the Record on Appeal on Appellant's Counsel, P. Brandt Shelbourne and John T. Kornegay, via e-mail to brandt@shelbournelaw.com and john@shelbournelaw.com, this 22nd day of March, 2021.

s/Andrew T. Shepherd
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March 22, 2021