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September 14, 2021

The Honorable Jenny A. Kitchings, Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

94702  
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SEP 20 2021

SC Court of Appeals

RE: Fred Holland Realty, Inc., and LaJuan Kennedy v. The City of Folly Beach  
Civil Action No.: 2020-CP-10-03549  
Appellate Case No: 2021-000105

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion to File Final Brief of Appellant Out of Time, seeking permission to file the Final Brief. Please return by email a stamped/ filed copy of the motion.

I will be enclosing with the mailed copy of the letter my check in the amount of \$50.00 representing the filing fee. I am also enclosing with the letter the original loose leaf and the bound copy of the Final Brief of Appellant.

By copy of this letter, we are also serving counsel for the Respondent, Joseph Wilson, IV, with this Motion and the Final Brief of Appellant.

Thank you for your consideration in this matter.

With highest regards, I remain

Very truly yours,

s/John Carrigg  
John Carrigg

JWC/adr

Enclosure(s)

CC: Joseph Wilson, IV, counsel for Respondent, The City of Folly Beach. Via US Mail and email: [jwilson@cityoffollybeach.com](mailto:jwilson@cityoffollybeach.com)

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Jennifer B. McCoy, Circuit Court Judge

Case Number: 2020-CP-10-03549  
Appellate Case No: 2021-000105

Fred Holland Realty, Inc., and LaJuan Kennedy.....Appellants.  
v.

The City of Folly Beach.....Respondent.

PROOF OF SERVICE

I certify that I have served the Motion to File Final Brief Out of Time of Appellants Fred Holland Realty, Inc., and LaJuan Kennedy on the above-listed Respondent by depositing a copy of it in the United States Mail, postage prepaid, on September 14, 2021 addressed to Respondent's attorneys of record as detailed below and was served via email to opposing counsels email, [jwilson@cityoffollybeach.com](mailto:jwilson@cityoffollybeach.com) .

September 14, 2021.

s/John Carrigg  
John Carrigg  
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SC Bar # 0015239  
[jcarrigg@carrigglaw.com](mailto:jcarrigg@carrigglaw.com)  
Attorney for Appellants

Other Counsel of Record:  
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P.O. Box 178  
Folly Beach, S.C. 29439  
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