

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

MAR 24 2022

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

SC Court of Appeals

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2022-000017  
Civil Action No. 2021-CP-22-00605

Joseph N. Grate,..... Appellant,


v.

Christopher Douglas Brown,..... Respondents.

**PROOF OF SERVICE**

I, the undersigned, do hereby state that I have on March 22, 2022 served copies of **RESPONDENT'S MOTION TO STRIKE** and **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF AND DESIGNATION OF MATTER** upon the Appellant, *pro se*, all other parties, by depositing copies of the documents in the United States Mail, first class, sufficient postage prepaid, with the return address(es) clearly noted, addressed as follows:

Joseph N. Grate  
P.O. Box 1294  
Pawley's Island, SC 29585



Matthew G. Gerrald, S.C. Bar No. 76236  
Barnes, Alford, Stork & Johnson, LLP  
1613 Main Street (29201)  
Post Office Box 8448  
Columbia, SC 29202  
(803) 799-1111

WELDON R. JOHNSON \*  
DAVID G. WOLFF  
KAY GAFFNEY CROWE \*  
ALAN J. REYNER †  
RICHARD C. THOMAS  
ROBERT T. STRICKLAND  
CURTIS W. DOWLING  
MATTHEW G. GERRALD  
EMILY COLLINS BROWN  
JEFFREY D. HOPKINS \*\*  
CREASIE PARROTT SCHLACHTER \*\*  
JOSHUA G. HILL



# BARNES ALFORD

Barnes Alford Stork & Johnson L.L.P.

ATTORNEYS AT LAW

OF COUNSEL  
WILLIAM C. STORK  
ROGER A. WAY, JR.

\* CERTIFIED CIVIL  
COURT MEDIATOR

† CERTIFIED SPECIALIST  
IN TAXATION

\*\* ALSO ADMITTED IN  
NORTH CAROLINA

RUDOLPH C. BARNES  
(1917-1995)  
JAMES W. ALFORD  
(1930-2008)

March 22, 2022

South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

95874  
95875

**RECEIVED**

MAR 24 2022

SC Court of Appeals

Re: Joseph N. Grate v. Christopher Douglas Brown.  
Appellate Case No. 2022-000017  
BASJ File No. 217.22536

Dear Sir or Madam:

Enclosed please find originals of Respondent's Motion to Strike, Respondent's Motion for Extension of Time to File Reply Brief and Designation of Matter, and a Proof of Service in this case. Copies of these documents were previously filed via email.

Also enclosed is a check for \$100.00 covering the filing fees for the two motions.

With best regards, I am

Very truly yours,

Matthew G. Gerrald

MGG/tas  
Enclosures

cc: Joseph N. Grate

POST OFFICE BOX 8448  
OFFICE: 803.799.1111

CURTIS W. DOWLING  
1613 MAIN STREET (29201)  
FAX: 803.254.1335  
WWW.BARNESALFORD.COM

COLUMBIA, SC 29202  
CURTIS@BASJLAW.COM



# BARNES/ALFORD

BARNES ALFORD STORK & JOHNSON, LLP

ATTORNEYS AT LAW

1613 MAIN STREET, POST OFFICE BOX 8448  
COLUMBIA, SOUTH CAROLINA 29202-8448

COLUMBIA  
SC 290  
22 MAR 22  
PM 4 L

FIRST-CLASS



US POSTAGE IMPITNEY BOWES



ZIP 29201  
02 7H  
0006024371

\$ 000.73<sup>0</sup>  
MAR 22 2022

South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

# RECEIVED

MAR 24 2022

## SC Court of Appeals

29211-162929

