

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

Jul 26 2022

SC Court of Appeals

APPEAL FROM HORRY COUNTY

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2021-000838

Case No. 2018-CP-26-5438

Tara Gurry,

Appellant,

v.

Myrtle Beach Dermatology, LLC,

Respondents.

Shannon Hussey, Richard Hussey M.D.

MOTION TO AMEND THE RECORD ON APPEAL

Tara Gurry

711 A 3rd Avenue S,

North Myrtle Beach, SC 29582

(843) 877-5839

Appellant-Pro Se Litigant

Marian Scalise, Lydia Magee, & Hunter Holland

2103 Farlow Street,

Myrtle Beach, SC 29578

(843) 448-1008

Andrew F. Lindemann

5 Calendar Court, Suite 202

Columbia, SC 29260

803-881-8921

Attorneys for Respondents

Appellant motions the Court of Appeals to consent to amending the Record on Appeal by including the entire transcript from Dr. Wikas deposition dated June 21, 2021, replacing the June 28, 2019 deposition . In preparing Final Briefs this error has been found on the Record on Appeal in the above-referenced matter, and therefore both the Appellant and Respondents can not properly reference Final Briefs that are due July 26, 2022, and The Record on Appeal must be corrected.

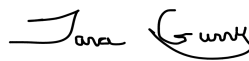
In addition, I'd like to amend the Designation of Matter to include only the excerpts from the June 28, 2019 deposition that are referenced in Appellant's Initial Brief and Reply Brief. I would like these to be included in Record on Appeal.

The Final Briefs and Final Record on Appeal are currently due on July 26, 2022 yet because of the error being found on The Record on Appeal, specifically transcript dated June 21, 2021 was not included, it is not possible to submit Final Briefs. Therefore the Appellant respectfully request the motion to consent to amend The Record on Appeal which will set the due date of the Final Briefs to start after the Record on Appeal has been amended and filed.

The \$50 filing fee has been put in the mail.

If you have any questions, or concerns please let me know. With kindest regards,

Sincerely,



Tara Gurry
Pro Se Appellant
711A 3rd Avenue South
North Myrtle Beach SC 29582
843-877-5839
photo7721@gmail.com

cc via email only: Attorneys: Lydia Magee, Marian Scalise, Hunter Holland with Richardson & Plowden
Andrew F. Lindemann with Lindemann & Davis Law Firm



Tara Ann <photo7721@gmail.com>

Agreement of Service of Filings

4 messages

Tara Ann <photo7721@gmail.com>

Mon, Jun 20, 2022 at 3:39 PM

To: Marian Scalise <mscalise@richardsonplowden.com>, Hunter Holland <HHolland@richardsonplowden.com>, Lydia Magee <lmagee@richardsonplowden.com>, Brandi Zilbermann <BZilbermann@richardsonplowden.com>

Good afternoon,

Great talking to you today Marian, per our conversation, here is our agreement below:

Pro Se Appellant Tara Gurry and the attorneys at Richardson and Plowden, Marina Scalise, Lydee Magee and Hunter Holland have agreed Tara Gurry may serve the Appeal filings via email.

If you would please reply via email that you agree to this.

Thank you,
Tara A. Gurry
843-877-5839

Marian Scalise <MScalise@richardsonplowden.com>

Wed, Jun 22, 2022 at 7:38 AM

To: Tara Ann <photo7721@gmail.com>, Hunter Holland <HHolland@richardsonplowden.com>, Lydia Magee <LMagee@richardsonplowden.com>, Brandi Zilbermann <BZilbermann@richardsonplowden.com>, Beth McNeill <bmcneill@richardsonplowden.com>

Tara,

Marian Scalise, Lydia Magee, and Hunter Holland agree that Tara Gurry can serve appellate documents to us by email so long as there is a confirmation receipt.

I do not want there to be an issue with you thinking you sent something to us and we got it when we didn't. The confirmation receipt will ensure we got it.

Please always copy Beth McNeill on any emails as well.

Thanks,

Marian

From: Tara Ann [mailto:photo7721@gmail.com]

Sent: Monday, June 20, 2022 3:40 PM

To: Marian Scalise <MScalise@RichardsonPlowden.com>; Hunter Holland <HHolland@RichardsonPlowden.com>; Lydia Magee <LMagee@RichardsonPlowden.com>; Brandi Zilbermann <BZilbermann@RichardsonPlowden.com>

Subject: Agreement of Service of Filings

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

[Quoted text hidden]

Tara Ann <photo7721@gmail.com>

Wed, Jun 22, 2022 at 8:12 AM

To: Marian Scalise <MScalise@richardsonplowden.com>

Cc: Hunter Holland <HHolland@richardsonplowden.com>, Lydia Magee <LMagee@richardsonplowden.com>, Brandi Zilbermann <BZilbermann@richardsonplowden.com>, Beth McNeill <bmcneill@richardsonplowden.com>

Thank you, I will send a read receipt for confirmation when appellate documents are emailed and include all of the above recipients.

Enjoy your day!

Tara A. Gurry
843-877-5839

[Quoted text hidden]

Marian Scalise <MScalise@richardsonplowden.com>

Wed, Jun 22, 2022 at 8:30 AM

To: Tara Ann <photo7721@gmail.com>

Thanks

Sent from my iPhone

On Jun 22, 2022, at 8:13 AM, Tara Ann <photo7721@gmail.com> wrote:

[Quoted text hidden]



Tara Ann <photo7721@gmail.com>

Agreement to Service of Filings

3 messages

Tara Ann <photo7721@gmail.com>
To: Andrew Lindemann <Andrew@ldlawsc.com>

Fri, Jul 22, 2022 at 12:23 PM

Good day Mr. Lindemann,

I hope all is well, and you are enjoying your summer.

I would like to ask if you would kindly agree that I may serve the Appeal filings via email. I have approval from the attorneys at Richardson and Plowden, Marina Scalise, Lydee Magee and Hunter Holland.

Pro Se Appellant Tara Gurry and the attorneys at Richardson and Plowden, Marina Scalise, Lydee Magee and Hunter Holland have agreed Tara Gurry may serve the Appeal filings via email, and a confirmation read receipt for all appellate documents emailed will be sent too.

In email from Marian Scalise:

"Marian Scalise, Lydia Magee, and Hunter Holland agree that Tara Gurry can serve appellate documents to us by email so long as there is a confirmation receipt."

If you would please reply via email that you agree to this, it will be appreciated.

Pro Se Appellant Tara Gurry and attorney, Mr. Andrew Lindemann, agree that Tara Gurry may serve the Appeal filings via email with a confirmation read receipt.

Please let me know if you have any questions.

Thank you,

Tara Gurry

843-877-5839

Andrew Lindemann <Andrew@ldlawsc.com>
To: Tara Ann <photo7721@gmail.com>

Fri, Jul 22, 2022 at 12:30 PM

7/26/22, 10:17 AM

Gmail - Agreement to Service of Filings

Ms. Gurry, that is fine with me as well.

Andrew Lindemann

[Quoted text hidden]

Tara Ann <photo7721@gmail.com>
To: Andrew Lindemann <Andrew@ldlawsc.com>

Fri, Jul 22, 2022 at 12:32 PM

Thank you!

[Quoted text hidden]

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas

Honorable Benjamin Culbertson,

Circuit Court Judge

Appellate Case No. 2021-000838

Case No. 2018-CP-26-5438

RECEIVED

Jul 26 2022

SC Court of Appeals

Tara Gurry,

Appellant,

v.

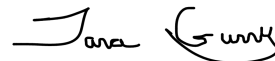
Myrtle Beach Dermatology, LLC,

Respondents.

Shannon Hussey, Richard Hussey M.D.

PROOF OF SERVICE

The Appellant and Respondents Counsel have mutual agreed by email consent, that the Appellant may serve all Appeal filings via email to Respondents Counsel. I certify that I have served the Motion to Amend The Record on Appeal via email only to Attorneys: Lydia Magee, Marian Scalise, Hunter Holland with Richardson & Plowden and to Mr. Andrew F. Lindemann with Lindemann & Davis Law Firm



Tara Gurry

North Myrtle Beach, SC

July 26, 2022

711 A 3rd Avenue S, North Myrtle

Beach, South Carolina 29582

(843) 877-5839

Appellant-Pro Se Litigant