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Aug 05 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Edward W. Miller, Circuit Court Judge

Case No. 2018-CP-23-04516
Appellate Case No. 2021-001461

Ironwork Productions, LLC, Appellant,

v.

Bobcat of Greenville, LLC, and Bobcat Company, Inc., Respondents.

APPELLANT'S MOTION TO AMEND RECORD ON APPEAL

Appellant Ironwork Productions, LLC hereby moves to amend the Record on Appeal that was originally served on the Respondents and filed with the Court on August 2, 2022. Shortly after filing and serving the Record on Appeal, it came to Appellant's attention that it: (1) inadvertently failed to include a 2-page email originally included as an exhibit to the document identified as item no. 10 in Respondent Bobcat of Greenville, LLC's Designation of Matter to Be Included in the Record on Appeal filed June 10, 2022; (2) inadvertently included a 2-page order originally identified as item no. 20 in Appellant's Designation of Matter to Be Included in the Record on Appeal dated April 11, 2022 which was subsequently withdrawn by consent of the parties; and (3) inadvertently failed to number the volumes of the Record on Appeal in accordance with Rule 267(d), SCACR.

Accordingly, pursuant to Rule 240, SCACR, Appellant makes this motion to insert the email described above into the Record on Appeal; delete the order described above from the Record; and to renumber the Record in accordance with these changes and ensure that all volumes comply with Rule 267(d), SCACR. Overall, the Amended Record on Appeal shall contain the same total number of pages as the underlying Record on Appeal but with changes to the page numbering. This is Appellant's first request to amend the Record on Appeal, and Appellant is not currently aware of any other revisions that would need to be made. Appellant is also prepared to move forward with filing its final briefs in a timely manner.

Prior to the filing of this Motion, counsel for Appellant consulted with counsel for Respondent Bobcat of Greenville, LLC who consented to the relief requested by Appellant. Counsel for Appellant also attempted to consult with counsel for Respondent Clark Equipment Company but was advised he was unavailable and out of the office for the week. This Motion to Amend the Record on Appeal is not intended to hinder, delay, or prejudice the judicial proceedings.

Respectfully submitted,

s/Adam C. Bach

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Attorneys for Appellant Ironwork
Productions, LLC

August 5, 2022

Greenville, South Carolina

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PROOF OF SERVICE

The undersigned certifies that he served the Appellant's Motion to Amend Record on Appeal upon the Respondent by depositing one (1) copy of same in the United States Mail, postage prepaid, on this the 5th day of August, 2022, addressed to the attorneys of record at the address listed below:

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