

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No.: 2005-CP-10-4101

The Milton P. Demetre Family Limited PartnershipAppellant,

v.

Harry Beckmann, III, Patricia P. Beckmann,
Annie Ruth Hilton Crowley, Raymond Moody Crowley,
Donald William Crowley, Harris L. Crowley, Jr.,
and Annie Ruth Crowley AtkinsonRespondents:

APPELLANT’S MOTION TO
SUPPLEMENT THE RECORD

Appellant respectfully moves to supplement the record by adding the following documents to Volume Three of the Record on Appeal on the basis that citation to these documents in Appellant’s Initial Reply Brief was necessary to address certain arguments in the Initial Brief of Respondents:

REC
JUN 08 2012
SC Court

1. Transcript of Proceedings from Hearing held on December 12, 2006: pp. 4 – 8, 10 – 11, 35 – 36, 43 – 48, 80 – 81, 139 – 140, 156- 157, 251, 298 – 304, 306 – 317, and 346 – 347;
2. Plaintiff's Memorandum in Opposition to the Dock Defendants' Proposed Order (filed April 16, 2010);
3. Plaintiff's Reply to the Dock Defendants' Correspondence to the Court of April 21, 2010 (filed April 23, 2010)
4. Proposed Final Order submitted by Plaintiff to the Master-in-Equity (submitted in 2010);
5. 1920 Plat – Oversized Copy;
6. 1965 Plat – Oversized Copy; and
7. 2005 Kennerty Topographic Survey – Oversized Copy.

WHEEFORE, Appellant respectfully moves to supplement the record by adding the above-specified documents to Volume Three of the Record on Appeal.

May 29, 2013

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PROOF OF SERVICE

I certify that I have served Appellant's Motion to Supplement the Record on Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley, Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr., and Annie Ruth Crowley Atkinson by depositing a copy of it in the United States Mail, postage prepaid, on May 29, 2013, addressed to their attorneys of record, Jefferson D. Griffith, III, Esquire, and Richard L. Witt, Esquire, Austin & Rogers, P.A., Post Office Box 11716, Columbia, South Carolina 29211.

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