

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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Nov 21 2022

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

S.C. SUPREME COURT

J. Mark Hayes, II, Circuit Court Judge

Appellate Tracking No. 2018-002223
(S.C. Ct. App. Filed March 11, 2022)

H. Hugh Andrews,

Petitioner,

v.

Quentin S. Broom, Jr.

Respondent.

**PETITIONER’S MOTION TO FILE A REDUCED NUMBER OF COPIES OF
THE RECORD ON APPEAL IN SUPPORT OF HIS
PETITION FOR *CERTIORARI***

Comes now, Petitioner H. Hugh Andrews, by and through his undersigned attorney of record, Rodney F. Pillsbury of the Pillsbury Law Firm, does hereby move this Honorable Court pursuant to Rule 267(f) SCRAP for permission to file five (5) copies of the record on appeal, instead of the ten (10) additional copies set forth by the Court in its order of October 27, 2022 (a copy of the order is attached for the Court’s convenience as Exhibit 1). The reason for this request is the Record on Appeal is currently 2,866 pages – divided into six (6) volumes.

The Record on Appeal is necessarily voluminous due to the extensive litigation history behind this case. This is the second time this case has been before this Court. Originally, the trial court granted a Respondent’s motion to dismiss on November 1, 2011. The Court of Appeals reversed the trial court in an unpublished opinion, Broom v.

Andrews, Op. No. 2015-UP-030 (S.C. Ct. App. filed Jan. 14, 2015). This Court reversed the Court of Appeals in an unpublished opinion: Broom v. Andrews, Op. No. 2015-MO-057 (S.C. Sup. Ct. filed Sept. 30, 2015).

After remand, the case was ultimately tried from June 26, 2017 through June 28, 2017. The trial court entered an order in favor of Petitioner on November 8, 2017, which directed Petitioner to submit a motion for attorney's fees and costs. The trial court entered a final order and verdict in favor of the Petitioner in the amount of \$1,214,406.53 on November 20, 2018.

Respondent filed his appeal. On January 12, 2022, the Court of Appeals reversed the trial court in an unpublished decision: Andrews v. Broom, Slip. Opin. No.: 12022-UP-022 (filed January 12, 2022). Because the second appeal involves matters that were raised during the first appeal, the arguments addressed during the first appeal are necessarily relevant to the record of this appeal.

Because of the sheer volume, Petitioner respectfully requests permission to file five (5) copies of the record on appeal. If the Court finds that additional copies are necessary (or preferred), Petitioner can file the additional copies at any later time requested by the Court. But in the interests of judicial economy and cost savings for the parties, Petitioner respectfully request the Court allow Petitioner to submit five (5) copies at this time.

Prior to filing this motion, counsel for Petitioner has consulted with counsel for the Respondent. Counsel for the Respondent consents to the Court granting the relief requested by the Petitioner in this motion.

Respectfully submitted,

Pillsbury Law Firm, LLC

/s/Rodney F. Pillsbury

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November 21, 2022