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**Dec 19 2022**

**S.C. SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Judge

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Appellate Case No.: 2020-000070  
Unpublished Opinion No. 2022-UP-331 (Filed August 10, 2022)  
Lower Court Case No. 2015-CP-04-00667

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Ex Parte: Donald L. Smith,  
In Re: Greg Battersby,

Appellant,  
Plaintiff

v.

J. Kirkman Moorehead, Krause, Moorhead &  
Draisen, P. A., All State Insurance Company,  
And Allstate Northbrook Indemnity Company,

Defendants,

J. Kirkman Moorehead, Krause, Moorhead &  
Draisen, P. A.,

Respondents.

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**MOTION FOR LEAVE TO FILE AMENDED  
PETITION FOR WRIT OF CERTIORARI**

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On November 29, 2022, Appellant filed his Petition for Writ of Certiorari. Appellant has since recognized a need to provide more clarity to said petition. Thus, it is believed that providing the Court with further clarity regarding the issues at hand will allow for better reasoning and logical deduction.

Appellant respectfully requesting this Honorable Court to allow him to submit his Amended Petition for Writ of Certiorari. Respondents will not be prejudiced by this amendment since the same is being made prior to the filing of their response to said petition. The materials

from which the amendments have been made are already in the possession of have already been provided to them during the course of the appeal.

**WHEREFORE**, Appellant respectfully moves this Honorable Court to allow him to amend his previously filed Petition for Writ of Certiorari. This motion is not being sought for the purpose of inconvenience or harassment.

**s/Donald L. Smith**  
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Anderson, South Carolina  
December 19, 2022.