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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE
COUNTY CIRCUIT COURT

RECEIVED

G. D. Morgan, Jr., Circuit Court Judge

APR 21 2023

Perry H. Gravely, Circuit Court Judge

SC Court of Appeals

Circuit Court Case No. 2020-CP-23-01450
Appellate Case No. 2022-001432

Michael Gene Putnam.....Appellant,

v.

Robert Henry Purkerson and Robin Cary Maples.....Respondents:

NOTICE AND MOTION TO AMEND NOTICE OF APPEAL

The Appellant, Michael Gene Putnam, had previously submitted by Notice of Appeal for Appellate Court consideration the Order of G.D. Morgan, Jr., Circuit Court Judge, dated September 8, 2022 denying Plaintiff's Motion to Reconsider the Order Granting Defendants' Motion for Summary Judgment dated August 17, 2022. This Amendment now respectfully request the inclusion of the Orders of Perry H. Gravely, Circuit Court Judge, dated December 27, 2021 denying Plaintiff's Motion to Reconsider the Order Granting Defendant Maples' Motion for Summary Judgment dated December 6, 2021.

Respectfully submitted,

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr. (73789)

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Attorneys for Appellant

April 21, 2023

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Michael Gene Putnam,.....Appellant,

v.

Robert Henry Purkerson and Robin Cary Maples.....Respondents.

PROOF OF SERVICE

I certify that I have served a copy of the **NOTICE AND MOTION TO AMEND NOTICE OF APPEAL** on Wesley J. Shull, Esquire, counsel for Respondent Purkerson, and Douglas R. Churdar, Esquire, counsel for Respondent Maples, at the addresses below by depositing a copy of same in the United States Mail, postage prepaid, as well as via email as shown, on April 21, 2023.

Wesley J. Shull, Esquire
Wilson, Jones, Carter & Baxley
325 Rocky Slope Road, Suite 201
Greenville, SC 29607
wjshull@wjcblaw.com

Mr. Douglas A. Churdar, Esquire
Churdar Law Firm
304 Pettigru St.
Greenville, South Carolina 29601
Doug@upstatelawyer.com

Via E-Filing Portal

The Honorable Perry H. Gravely
Greenville County Clerk of Court

GOODWYN LAW FIRM, LLC



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Attorneys for Appellant

Columbia, South Carolina
April 21, 2023

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Charles G. Blackburn**
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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

April 21, 2023

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED

APR 21 2023

SC Court of Appeals

RE: *Michael Gene Putnam v. Robert Henry Purkerson*
Case No.: 2020-CP-23-01450
Appellate Case No.: 2022-001432
Our File No.: 3000-0743

Dear Ms. Kitchings:

Please find attached Appellate Michael Gene Putnam's Notice and Motion to Amend Notice of Appeal. The Goodwyn Law Firm, LLC filed a Notice of Appearance in the Circuit on July 29, 2022 and through an oversight of a very large Circuit Court file did not include the original Notice of Appeal the Orders of Judge Perry H. Gravely dated December 27, 2021 and December 6, 2021. Please find enclosed an original and one copy of the respective Orders for consideration of the Court. In as much as the Appellant has not yet filed his Initial Brief that there is no prejudice as neither Respondent has knowledge of what the issues of Appeal will be presented.

Also, enclosed in addition to the Notice and Motion to Amend Notice of Appeal, is a properly prepared Proof of Service to all parties including counsel for Respondent Maples, Mr. Douglas A. Churdar. Please return a filed copy of these filings including the Orders of Judge Perry H. Gravely which will be properly provided to the Circuit Court in Greenville County, South Carolina.

GOODWYN LAW FIRM, LLC

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: The Honorable Perry H. Gravely. (Via Greenville County Clerk of Court)
Wesley J. Shull, Esquire
Douglas A. Churdar, Esquire
Michael G. Putnam