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May 22 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
COURT OF COMMON PLEAS

MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

APPELLATE CASE NO.: 2020-000614

CRM OF THE CAROLINAS, LLC,

v.

TREVOR W. STEEL,

Appellant,

Respondent.

MOTION TO SUPPLEMENT RECORD ON APPEAL

J. Clay Hopkins (SC Bar No. 102053)
clay@hopkinsfirm.com
HOPKINS LAW FIRM, L.L.C.
171 Church Street, Suite 160
Charleston, South Carolina 29401
(843) 314-4202 – Telephone
(843) 314-9365 – Facsimile

Attorneys for Appellant

Appellant CRM of the Carolinas, LLC hereby moves the Court to allow it to supplement the Record on Appeal by including seven (7) additional pages, which are attached hereto as **Exhibit A**.

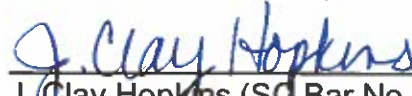
The documents were not designated by Appellant's counsel to be included in the original Record on Appeal because these documents relate solely to the issue of the timely service of the Notice of Appeal, which was first raised by Respondent in his Brief filed after the compilation and filing of the Record on Appeal.

These documents support Appellant's position and contentions submitted in its Petition for Rehearing on the issue and therefore respectfully requests the Court allow the supplementation of the Record on Appeal to include these seven (7) pages.

CONCLUSION

Based on the foregoing, Appellant respectfully requests the Court grant its motion to supplement the Record on Appeal by including seven (7) pages which relate to the issue raised by Respondent in its Brief after the filing of the Record on Appeal and upon which the Court issued its Opinion dismissing the appeal for failure to timely serve the Notice of Appeal.

HOPKINS LAW FIRM, L.L.C.



J. Clay Hopkins (SO Bar No. 102053)

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ATTORNEY FOR APPELLANT

Charleston, South Carolina
May 22, 2023

Other Counsel of Record:

Roger P. Giardino, Esquire
Attorney at Law
Post Office Box 4413
Pawleys Island, SC 29585
(843) 314-4321

Attorney for Respondent

EXHIBIT A

Robert J. Moran, PA
Attorneys-at-Law
Post Office Box 370
Murrells Inlet, South Carolina 29576
Telephone: (843) 237-4533 E-Mail: Mulletlaw@sc.rr.com Facsimile: (843) 237-3163

December 1, 2017

William E. Hopkins, Jr.
PO box 1885
Pawleys Island, S.C. 29585

Re: CRM of the Carolinas, LLC v. Trevor Steel
2017-CP-22-00856

Dear Mr. Hopkins:

Enclosed please find served upon you the Defendant's Answer and Counterclaim in regards to the above referenced action, as well as a Certificate of Mailing of the same.

Sincerely,



Kimberly Pring

/kp

Enclosures as stated above

Ec: client

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DEC 04 2017



Sent: Bill Hopkins
Monday, November 6, 2017 9:48 AM
To: mullettlaw@sc.rr.com
Subject: Temporary Injunction Order
Attachments: Temporary Injunction Order.docx

Hey Bob, hope you had a nice weekend. Here is the proposed Order for your review.

William E. Hopkins, Jr.
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
bill@hopkinsfirm.com

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Bill Hopkins

From: Hennigar, Leslie <lhennigar@hsblawfirm.com>
Sent: Monday, November 19, 2018 10:28 AM
To: mulletlaw@sc.rr.com; Kathy Roberts; Bill Hopkins
Subject: Confirming mediation CRM of the Carolinas v Trevor Steel scheduled for Nov 28 at Mr. Moran's office on Pawleys Island please (7017-3260)

HAYNSWORTH SINKLER BOYD

Leslie F. Hennigar | Legal Secretary
Direct 843.720.4402 | lhennigar@hsblawfirm.com

Haynsworth Sinkler Boyd, P.A.
134 Meeting Street, 3rd Floor | Charleston, SC 29401
Main 843.722.3366 | Fax 843.722.2266

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Bill Hopkins

From: Kimberly Pring <mullettlaw@sc.rr.com>
Sent: Tuesday, August 20, 2019 7:59 AM
To: Kathy Roberts; 'Donna Gray'; Bill Hopkins; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane'
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good Morning

Roger is available on this day as well. I am assuming since it is Columbus day that the Court house will be open anyway.

Kimberly Pring
Moran Giardino, LLC
843-237-4533/843-314-4321

From: Kathy Roberts [mailto:kathy@hopkinsfirm.com]
Sent: Monday, August 19, 2019 3:19 PM
To: Donna Gray; Bill Hopkins; 'Giardinolaw@gmail.com'
Cc: mullettlaw@sc.rr.com; Lucinda Lesane
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Works for us. Thanks Donna!

Take care - Kathy



Kathryn Y. (Kathy) Roberts
Litigation Paralegal
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Post Office Box 1885
Pawleys Island, SC 29585
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From: Donna Gray <degray@crosbyfirm.com>
Sent: Tuesday, August 20, 2019 9:34 AM
To: Kimberly Pring <mullettlaw@sc.rr.com>; Kathy Roberts <kathy@hopkinsfirm.com>; Bill Hopkins <bill@hopkinsfirm.com>; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane' <llesane@gtcounty.org>
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good morning,

Yes the courthouse is open Columbus day. I will calendar for this date and time so please mark your calendars. Also, reminder that we do not provide a court reporter so if you need one you will have to get one. Thanks.

From: Kimberly Pring [<mailto:mullettlaw@sc.rr.com>]
Sent: Tuesday, August 20, 2019 7:59 AM
To: 'Kathy Roberts'; Donna Gray; 'Bill Hopkins'; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane'
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good Morning

Roger is available on this day as well. I am assuming since it is Columbus day that the Court house will be open anyway.

Kimberly Pring
Moran Giardino, LLC
843-237-4533/843-314-4321

From: Kathy Roberts [<mailto:kathy@hopkinsfirm.com>]
Sent: Monday, August 19, 2019 3:19 PM
To: Donna Gray; Bill Hopkins; 'Giardinolaw@gmail.com'
Cc: mullettlaw@sc.rr.com; Lucinda Lesane
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Works for us. Thanks Donna!

Take care - Kathy



Kathryn Y. (Kathy) Roberts
Litigation Paralegal
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Post Office Box 1885
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
kathy@hopkinsfirm.com

Bill Hopkins

From: mulletlaw@sc.rr.com
Sent: Monday, October 14, 2019 7:12 PM
To: Bill Hopkins
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Thank you very much. Have a great evening.

Kimberly Pring

Moran Giardino LLC

From: "Bill Hopkins"
To: "Kimberly Pring", "Kathy Roberts"
Cc:
Sent: Monday October 14 2019 7:01:12PM
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Fine by me, thanks Roger.



William E. Hopkins, Jr.
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
bill@hopkinsfirm.com

Please watch our firm [video!](#)

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From: Kimberly Pring <mullettlaw@sc.rr.com>
Sent: Monday, October 14, 2019 2:15 PM
To: Kathy Roberts <kathy@hopkinsfirm.com>; Bill Hopkins <bill@hopkinsfirm.com>
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good Afternoon

I have attached a proposed order in regards to the Temporary Injunction in the above referenced action. Please review and let me know if you would like any changes.

Kimberly Pring
Moran Giardino LLC
PO Box 4413
Pawleys Island, SC 29585
843-237-4533/843-314-4321

From: Kathy Roberts [<mailto:kathy@hopkinsfirm.com>]
Sent: Tuesday, August 20, 2019 10:20 AM
To: Donna Gray; Kimberly Pring; Bill Hopkins; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane'
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Thanks Donna. We will arrange for a court reporter.

Take care - Kathy



Kathryn Y. (Kathy) Roberts
Litigation Paralegal
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APPEAL FROM FLORENCE COUNTY
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MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

APPELLATE CASE NO.: 2020-000614

CRM OF THE CAROLINAS, LLC,

Appellant,

v.

TREVOR W. STEEL,

Respondent.

PROOF OF SERVICE

I, J. Clay Hopkins, Esquire hereby certify that on May 22, 2023, I caused a true and correct copy of Appellant's **Motion to Supplement Record on Appeal** in the above captioned action to be served on counsel of record via email and U.S. Mail, postage pre-paid, addressed as follows:

Roger P. Giordino, Jr., Esquire
Attorney at Law
Post Office Box 4413
Pawleys Island, SC 29585
giardinolaw@gmail.com


J. Clay Hopkins

Charleston, South Carolina