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**Jun 09 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

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Case No. 2022-001547

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Turner's Marina, LLC,

Respondent-Appellant,

v.

Paige Lorberbaum, Jeffrey A. Klapper, and Diane L. Klapper

Defendants,

Of whom Paige Lorberbaum is the Appellant-Respondent and Jeffrey A. Klapper  
And Diane L. Klapper are Respondents

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APPELLANT-RESPONDENT PAIGE LORBERBAUM'S MOTION TO FILE  
AMENDED RECORD ON APPEAL, EXTEND TIME TO FILE FINAL BRIEFS

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The Appellant-Respondent, Paige Lorberbaum ("Lorberbaum"), has determined she inadvertently omitted the pleadings related to the Motion to Dismiss filed by Respondent-Appellant Turner's Marina, LLC, dated January 23, 2023. The only party which referenced said material in the Initial Briefs was Lorberbaum. Lorberbaum requests the Court's permission to file an Amended Record on Appeal in seven (7) days to add these documents and to extend the deadline for all the parties to file their final briefs under Rule 211(a) SCACR for ten (10) days after the Amended Record on Appeal is filed. The omitted materials will be added to the end of the original

Record on Appeal.

Counsel for the Respondents, Jeffrey A. Klapper and Diane L. Klapper, have consented to this request. Counsel for the Respondent-Appellant, Turner's Marina, LLC ("Turner"), objected on the basis it filed its Final Briefs on June 8, 2023. However, since Turner did not reference the inadvertently omitted materials in any of its Final Briefs, the amendment of the Record on Appeal will not require Turner to take any action to amend or re-files its Final Briefs. Turner's Final Briefs can remain as they were originally filed.

RUSSELL P. PATTERSON, P.A.

/s/ Russell P. Patterson

Russell P. Patterson, Esq. (SC Bar No.: 4375)

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*Attorneys for the Appellant-Respondent,*

*Paige N. Lorberbaum*

Hilton Head Island, South Carolina  
June 9, 2023

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that on the date indicated below, counsel for Respondent-Appellant was served with a copy of the Appellant-Respondent Paige N. Lorberbaum's Motion to File Amended Record on Appeal, Extend Time to File Final Briefs by e-mail and U.S. Mail on the date set forth below.

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*Attorneys for the Appellant-Respondent,*

*Paige N. Lorberbaum*

Hilton Head Island, South Carolina  
June 9, 2023

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June 8, 2023

**Via E-Mail and Mail**

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

Re: Paige N. Lorberbaum, Appellant v. Turner's Marina LLC, Jeffrey A. Klapper,  
Diane L. Klapper, Respondents  
Case No.: 2022-001547

Dear Ms. Kitchings:

Please find enclosed the Appellant-Respondent Paige Lorberbaum's Motion to File Amended Record on Appeal, Extend Time to File Final Brief and a Certificate of Service for filing in the above referenced matter.

Thank you for your assistance in this matter. Please do not hesitate to contact me with any questions.

Sincerely,  
**RUSSELL P. PATTERSON, P.A.**

  
Russell P. Patterson

RPP:djd

Enclosures

cc: Counsel of Record (w/encl.)  
Paige N. Lorberbaum (w/encl.)