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**Aug 15 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas  
C/A No. 2019-CP-32-01442  
Debra R. McCaslin, Circuit Judge

Appellate Case No. 2022-000597

Suzan Garland ..... Respondent,

v.

Robert Cade, Christy Cade, and Roger Singleton..... Defendants,

of whom

Robert Cade and Christy Care are the Appellants and Roger Singleton in a Respondent

**RESPONDENT  
Roger Singleton's  
MOTION TO AMEND FINAL BRIEF**

The respondent Roger Singleton, by and through his undersigned counsel, requests this Court to accept his Amended Final Brief, which was filed with the Court on June 15, 2023. The initially filed final brief contained incorrect citations to the Record on Appeal, namely, when citing trial testimony, the brief referred to the page of the transcript contained in the Record instead of the page of the Record on which the particular page of the transcript appears. By filing the Amended Final Brief, Singleton sought to correct that mistake.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

*Michal Kalwajtys*

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Michal Kalwajtys, SC Bar No. 100950  
**BAKER RAVENEL & BENDER, LLP**  
3710 Landmark Drive, Suite 400  
Columbia, SC 29204  
(803) 343-3872  
mkalwajtys@brblegal.com  
**Attorney for the Respondent**  
**Roger Singleton**

August 15, 2023  
Columbia, South Carolina

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of whom

Robert Cade and Christy Care are the Appellants and Roger Singleton is a Respondent

**PROOF OF SERVICE**

I certify that on August 15, 2022, I have served the defendant Roger Singleton’s Motion to Amend Final Brief by electronic mail—in accordance with the May 6, 2020, order of the Supreme Court as Amended on May 6, 2022, Appellate Case No. 2020-000447 at § (d)(1)—on counsel for the appellants, Robert Cade and Christy Cade, and the respondent, Suzan Garland, sent to their AIS-registered email addresses, as follows: S. Jahue Moore, Esq., Jake@mbmlawsc.com; H. Freeman Belser, Esq., freeman@belserpa.com.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

*Michal Kalwajtys*

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Michal Kalwajtys, SC Bar No. 100950  
**BAKER RAVENEL & BENDER, LLP**  
3710 Landmark Drive, Suite 400  
Columbia, SC 29204  
(803) 343-3872  
mkalwajtys@brblegal.com  
**Attorney for the Respondent**  
**Roger Singleton**

August 15, 2023  
Columbia, South Carolina

**From:** [Michal Kalwajtys](#)  
**To:** ["Jake Moore"; "Freeman Belser"; "Creston Brown"; "mike@belserpa.com"](#)  
**Cc:** ["john@mbmlawsc.com"](#)  
**Subject:** Garland v. Cade--Singleton's Motion to Amend Final Brief--Appellate Case No. 2022-000597  
**Date:** Tuesday, August 15, 2023 11:47:00 AM  
**Attachments:** [Motion to Amend Final Brief \(01131484xA5D7B\).pdf](#)  
[Proof of Service of the Motion to Amend Final Brief \(01131492xA5D7B\).pdf](#)

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Gentlemen:

Attached please find a PDF file with Respondent Roger Singleton's Motion to Amend Final Brief, being served upon you as counsel of record in the above-referenced appeal.

Best regards,

Michal Kalwajtys  
Attorney

Direct Line: 803-343-3872  
Cell: 803-338-4783  
[mkalwajtys@brblegal.com](mailto:mkalwajtys@brblegal.com)



[www.brblegal.com](http://www.brblegal.com)  
mail. p.o. box 8057, columbia, sc 29202  
phone. 803.799.9091 | fax. 803.779.3423

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