

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

69162

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No.: 2005-CP-10-4101

The Milton P. Demetre Family Limited Partnership .....Appellant,

v.

Harry Beckmann, III, Patricia P. Beckmann,  
Annie Ruth Hilton Crowley, Raymond Moody Crowley,  
Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Atkinson ..... Respondents.

APPELLANT'S MOTION TO FILE AND SERVE  
SUPPLEMENTAL RETURN OF APPELLANT TO  
RESPONDENTS' MOTION TO COMPEL INCLUSION  
OF MATERIAL OMITTED FROM RECORD ON APPEAL

Appellant respectfully moves to file and serve a Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal on the basis that said Supplemental Return is needed to address new facts alleged and new authorities cited in Respondents' Reply to Appellant's Return to Respondents' Motion to Compel Inclusion of Material from Record on Appeal.

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SC Court of Appeals

WHEEFORE, Appellant respectfully moves to file and serve a Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal.

July 18, 2013

John Hughes Cooper, Esquire  
John Townsend Cooper, Esquire  
John Hughes Cooper, P.C.  
1476 Ben Sawyer Blvd., Suite 7  
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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Court of Common Pleas

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SC Court of Appeals

The Milton P. Demetre Family Limited Partnership .....Appellant,

v.

Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley,  
Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Atkinson .....Respondents.

PROOF OF SERVICE

I certify that I have served a copy of Appellant's Motion to File and Serve Supplemental Return of Appellants to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal and Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal on Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley, Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr., and Annie Ruth Crowley Atkinson by depositing a copy of it in the United States Mail, postage prepaid, on July 18, 2013, addressed to their attorneys of record, Jefferson D. Griffith, III, Esquire, and Richard L. Witt, Esquire, Austin & Rogers, P.A., Post Office Box 11716, Columbia, South Carolina 29211.

July 18, 2013

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July 18, 2013

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: The Milton P. Demetre Family Limited Partnership vs.  
Harry Beckmann, III, et al  
Appellate Case No. 2012-212136

Dear Ms. Kitchings:

Enclosed for filing please find:

- The original and seven (7) copies of Appellant's Motion to File and Serve Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal;
- The original and seven (7) copies of Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal;
- The original and one copy of Proof of Service for the above items.
- Motion Fee Check for \$25.

Please return stamped copies in the envelope provided.

Best wishes.

Very truly yours,

*Cain Denny*

Cain Denny

**RECEIVED**  
JUL 22 2013

**SC Court of Appeals**

c.c. Jefferson D. Griffith, III, Esquire (with enclosures)  
Richard L. Witt, Esquire (with enclosures)  
John Hughes Cooper, Esquire (with enclosures)  
Mr. Milton P. Demetre (with enclosures)