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SC Court of Appeals

**MOTION TO AMEND**

**NAMED RESPONDENTS TO CASE**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001342

Michael Carwane ,

Appellant.

v.

South Carolina Department of  
Juvenile Justice

Respondent.

**MOTION TO AMEND**

Appellant is formally requesting at this time to add named respondents to the Appellate Case No. 2023-001342. It was the intention in the lower Administrative Law Court to have enforcement of lawful subpoena and subsequent Motion to Compel orders for several organizations involved in the case against named Defendant, South Carolina Department of Juvenile Justice. The other organizations requested now, are the same organizations given notice, and named for the lower court to include the Saluda County Administrator, Sandra G. Padget (represented by Attorney Ginny Bozeman), the Saluda Police Department (represented by Attorney John Boyd), and the State Accident Fund (Represented by Attorney Nick Haigler). Although the Appellant previously sought legal resolution with communication with each of those organizations (while only naming SCDJJ as the sole Respondent to honor the origins of the complaint in the SC State Human Resource Administration), it is now clear to the Appellant that

there continue to be myriad issues with gaining resolution of the lawful Discovery materials from each affiliated organization. Furthermore, it was explained that the scope of this Appeal would not include, as presently drafted, those organizations originally treated as periphery to the named Respondent in the case, SCDJJ. Therefore, as it is the purpose of the Appellant's process within the SC Court of Appeals to receive final authority over all organizations that have failed to comply fully with the legal subpoena and Motion to Compel orders they have received to include review of their complicit actions to withhold Discovery materials. Appellant will also be better able to access the full range of evidence presented herein to the Court without risk of being deemed out of the scope of the Discovery attempt from SCDJJ alone, making a more complete picture of the facts of the case for the Court review. Appellant requests permission to have this Motion granted at this time. Appellant is willing to follow further instruction from the court upon approval of the motion regarding service of that notice to all involved parties, but will serve the current Respondent notice at this time, as expected.

November 21, 2023



Michael Carwane, pro se

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**PROOF OF SERVICE OF MOTION TO  
AMEND NAMED RESPONDENTS TO CASE**

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**PROOF OF SERVICE**

I certify that I have served the MOTION TO AMEND NAMED REpondents TO CASE, by depositing a copy of it in the United States Mail, postage prepaid to SC Court of Appeals, Clerk of Court, Jenny Abbott Kitchings, P.O. Box 11629, Columbia, SC, 29211.

November 21, 2023



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