

**RECEIVED**

**Jul 15 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

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Appellate Case No. 2023-001289

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Tasha Jones and Shaniqua Thompson, ..... Respondents,

v.

Lyndon Southern Insurance Company,  
Safe Choice Insurance, LLC, and  
Jupiter Managing General Agency, Inc, Defendants,

Of which

Lyndon Southern Insurance Company is the ..... Appellant.

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**MOTION FOR LEAVE TO FILE CORRECTED  
APPELLANT’S INITIAL OPENING BRIEF**

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Appellant Lyndon Southern Insurance Company (“Lyndon”) respectfully moves for leave to file its Corrected Appellant’s Initial Opening Brief. On June 27, 2024, Lyndon timely filed its Appellant’s Initial Opening Brief and Designation of Matter to the Record on Appeal. The Brief was complete and fully compliant with all Appellate Court Rules, with the exception that due to a simple oversight, an s/ signature was not added to the Brief prior to filing.

To correct this administrative error, Lyndon respectfully requests that the Court

grant this motion and accept filing of the Corrected Appellant's Initial Opening Brief submitted with this Motion. Undersigned counsel certifies that the only differences between its Appellant's Initial Opening Brief and its Corrected Appellant's Initial Opening Brief are the following:

1. The addition of the word CORRECTED on the cover page; and
2. The insertion of counsel's s/ signature.

Because no other changes were made to the Brief, the date of June 27, 2024 that appears in the signature block has not been changed.

Respectfully submitted,

*s/ Kirsten E. Small*

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Greenville, South Carolina  
July 15, 2024

*Attorneys for Appellant Lyndon Southern  
Insurance Company*

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**PROOF OF SERVICE**

I certify that I have served the foregoing **Motion for Leave to File Corrected Appellant’s Initial Opening Brief** on Respondents Tasha Jones and Shaniqua Thompson by emailing a copy of the same to the following counsel of record for Respondents, using the email addresses listed below:

Dietrich Andre’ Lake, [dietrich@thelakelawfirm.org](mailto:dietrich@thelakelawfirm.org)

July 15, 2024

*s/ Kirsten E. Small*