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Oct 14 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
COMMON PLEAS COURT

Honorable Debra R. McCaslin, Judge

Appellate No.: 2024-001479

Chiquita E. Cain.....Respondent.

v.

New Vision Automotive and Quintin Blackmon.....Appellant.

Motion to Amend Notice of Appeal

Quintin Blackmon, the Appellant would request the amendment of the previous Notice of Appeal filed with the court. The grounds for this request being that the business New Vision Automotive was not listed in the appeal from Magistrates Court to the Court of Common Pleas . Counsel for the Appellant would respectfully request that he be allowed to amend the Notice of Appeal to only list Quintin Blackmon as the Appellant and not New Vision Automotive; therefore, we would request the Notice of Appeal be amended to reflect that change.

John S. Keffer
John S. Keffer, Esquire
Keffer Law Firm
10 Law Range
Sumter, South Carolina 29150
803-774-1004
Attorney for Appellant

October 10, 2024

Other counsel of Record:

Michael Vincent Laubshire
455 St. Andrews Rd, Ste E-1
Cayce, SC 29033
michael@laubshirelaw.com
803-708-4888 fax
Attorney for Respondent

Hon. Debra R. McCaslin
205 East Main St, Ste 463
Lexington, SC 29072
dmccaslinj@sccourts.org
803-785-8444 fax
Presiding Judge

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Honorable Debra R. McCaslin, Judge

Case No. 2024-001479

Chaquita E. Cain,

Respondent,

v.

New Vision Automotive and Quintin Blackmon, Appellant.

PROOF OF SERVICE

I certify that I have served the **Notice of Motion and Motion to Amend Notice of Appeal**, on the Honorable Debra R. McCaslin by depositing a copy of it in the United States Mail, postage prepaid, on October 10, 2024, addressed to her at 205 East Main St, Ste 463, Lexington, South Carolina 29072, by faxing to 803-785-8444, and by emailing to dmccaslinj@sccourts.org.

October 10, 2024

s/ John S. Keffer

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Chiquita E. Cain,

Respondent.

v.

New Vision Automotive and Quintin Blackmon, Appellant.

PROOF OF SERVICE

I certify that I have served the **Motion to Amend the Notice of Appeal**, on Chiquita E. Cain by depositing a copy of it in the United States Mail, postage prepaid, on October 10, 2024, addressed to her attorney of record, Michael Vincent Laubshire, 455 St. Andrews Rd, Ste E-1, Cayce, South Carolina 29033, by faxing to 803-708-4888 and by emailing to michael@laubshirelaw.com.

October 10, 2024

s/ John S. Keffer
John S. Keffer,
SC Bar # 67910
10 Law Range
Sumter, SC 29150
803-774-1004
Attorney for Appellant



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October 10, 2024

South Carolina Court of Appeals
ATTN: Jenny Abbott Kitchings
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

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SC Court of Appeals

RE: *Chiquita E. Cain vs New Vision Automotive and Quintin Blackmon*
Docket No.: 2024-CP-32-01087
Appellate No.: 2024-001479
Keffer No.: 2350

Dear Ms. Kitchings,

Enclosed herewith you will please find a check in the amount of \$50.00 dollars for the filing fee of this **Motion to Amend the Notice of Appeal**, in the above matter. Also enclosed herewith you will find proof of Service on related parties is enclosed.

Upon receipt of this letter if you have any questions or concerns, please do not hesitate to contact my office.

With kindest regards, I am

Sincerely yours,

JOHN S. KEFFER

JSK/flp

Enclosure

Cc: Michael Laubshire
455 St. Andrews Rd, Ste E-1
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michael@laubshirelaw.com
803-708-4888 fax
Attorney for Respondent

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