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**Nov 05 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
James C. Campbell, Sumter County Clerk of Court

Circuit Court Case No.: 2024-CP-43-00703  
Appellate Case No. 2024-001073

Christol Morton.....Respondent,

v.

Carolina Cutting Coring, LLC and Sean Michael Shaffer, Jr..... Appellants.

**APPELLANTS MOTION TO AMEND  
DESIGNATION OF MATTER FOR  
RECORD ON APPEAL**

Appellants, by and through undersigned counsel, hereby moves to amend its Designation of Matter for Record on Appeal that was filed on October 3, 2024. Appellants seek to add to its designation of matter an email exchange dated June 19, 2024, which was first referenced in its Initial Reply Brief of Appellants filed on November 4, 2024. The undersigned has communicated with counsel for Respondent on November 5, 2024, and counsel for Respondent consents to this motion

*(signature on following page)*

Respectfully Submitted,

**TURNER, PADGET, GRAHAM  
& LANEY, P.A.**

*s/ Charles S. Gwynne Jr.*

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Charles S. Gwynne Jr. (SC Bar No. 73844)

Post Office Box 1473

Columbia, South Carolina 29202

Direct: 803-227-4228

cgwynne@turnerpadget.com

Attorneys for Appellants.

November 5, 2024

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Christol Morton,.....Respondents,

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**PROOF OF SERVICE**  
\_\_\_\_\_

The undersigned, attorney of record for the Appellants, certifies that on **November 5, 2024**, a copy of the **Appellants Motion to Amended Designation of Matter for Record on Appeal** was served on Attorneys for Respondents, via Electronic Mail as follows:

Brendan Green (SC Bar #104648)  
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PO Box 7965  
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john@bluesteinattorneys.com

*(signature on following page)*

Respectfully Submitted,

**TURNER, PADGET, GRAHAM  
& LANEY, P.A.**

*s/ Charles S. Gwynne Jr.*

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Attorneys for Appellants

# Turner | Padget

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SC Court of Appeals

Charles S. Gwynne Jr.

REPLY TO  
E-Mail: [cgwynne@TurnerPadget.com](mailto:cgwynne@TurnerPadget.com)  
Writer's Direct Dial: (803) 227-4228  
Writer's Direct Fax: (803) 400-1476

November 5, 2024

**Via mail and email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Christol Morton v. Carolina Cutting Coring, LLC and Sean Michael Shaffer, Jr.  
C/A No.: 2024-CP-43-00703  
TP File No.: 58000.110  
Appellate Case No. 2024-001073

Dear Ms. Kitchings:

Enclosed please find my firm's check in the amount of \$50.00 for the filing fee for Appellants Motion to Amend Designation of Matter for Record on Appeal filed on November 5, 2024, in the above-referenced matter.

Sincerely,

TURNER PADGET GRAHAM AND LANEY P.A.

*s/ Charles S. Gwynne Jr.*

Charles S. Gwynne Jr.

CSG

Enclosures as stated