

**RECEIVED**

**Jan 06 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

APPEAL FROM GEORGETOWN COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE B. ALEX HYMAN  
CIRCUIT COURT JUDGE

---

APPELLATE CASE NO. 2023-001454  
CIVIL ACTION NO. 2020-CP-00356

---

Ron Christmas,

**APPELLANT,**

versus

County of Georgetown; City of Georgetown; and  
South Carolina Department of Transportation,

**RESPONDENTS.**

---

**MOTION TO FILE SUPPLEMENTAL RECORD ON APPEAL**

---

Respondent South Carolina Department of Transportation (“SCDOT”) moves this Court to allow the filing of the Supplemental Record on Appeal which is submitted herewith. An item designated by the SCDOT was inadvertently admitted from the Record on Appeal. All counsel of record has consented to the filing of the Supplemental Record on Appeal.

Accordingly, the Respondent, SCDOT, respectfully requests this Court to permit the filing of the Supplemental Record on Appeal.

*(signature on following page)*

Respectfully submitted,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani (S.C. Bar No. 73515)  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
[cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com)

Lisa. A. Thomas (S.C. Bar No. 66458)  
Patrick L. Huff (S.C. Bar No. 105781)  
RICHARDSON, PLOWDEN & ROBINSON, PA  
2103 Farlow Street  
Myrtle Beach SC 29577  
(843) 448-1008  
[lthomas@richardsonplowden.com](mailto:lthomas@richardsonplowden.com)  
[phuff@richardsonplowden.com](mailto:phuff@richardsonplowden.com)

**ATTORNEYS FOR RESPONDENT  
SOUTH CAROLINA DEPARTMENT  
OF TRANSPORTATION**

January 6, 2025.

**CERTIFICATE OF SERVICE**

I, the undersigned, attorney for Respondent, South Carolina Department of Transportation, do hereby certify that I have this date served the foregoing Motion to File Supplemental Record on Appeal, dated January 6, 2025, by personally serving the same pursuant to Section (d)(1) of the Supreme Court’s Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Justin O’Toole Lucey  
Joshua Fletcher Evans  
Sohayla R. Townes  
JUSTIN O’TOOLE LUCEY, PA  
415 Mill Street  
Mt. Pleasant, SC 29464  
[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)  
[jevans@lucey-law.com](mailto:jevans@lucey-law.com)  
[stownes@lucey-law.com](mailto:stownes@lucey-law.com)  
**Attorneys for Appellant**

Michael Kirk Battle  
Michael Warner Battle  
BATTLE LAW FIRM, LLC  
1121 Third Ave  
PO Box 530  
Conway, SC 29528  
[kbattle@battlelawsc.com](mailto:kbattle@battlelawsc.com)  
[mbattle@battlelawsc.com](mailto:mbattle@battlelawsc.com)  
**Attorneys for County of Georgetown**

Andrew F. Lindemann  
LINDEMANN LAW FIRM, P.A.  
PO Box 6923  
Columbia, SC 29260  
[andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)  
**Attorney for City of Georgetown**

/s Carmen V. Ganjehsani  
Carmen V. Ganjehsani  
S.C. Bar No. 73515  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENT  
SOUTH CAROLINA DEPARTMENT OF  
TRANSPORTATION**

Dated: January 6, 2025.