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Jan 14 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
In the Court of Common Pleas for the First Judicial Circuit

The Honorable James E. Chellis, Master in Equity

Case No. 2019-CP-18-02217
Appellate Case No. 2024-000834

Virgie C. Simmons Family, LLC.....Plaintiff/ Appellant

vs.

Limetrade, LLC and Limehouse Produce, LLC.....Defendants/Respondents

RESPONDENTS' MOTION TO AMEND THEIR
DESIGNATION OF MATTER

The Respondents, Limetrade, LLC and Limehouse Produce, LLC, (the "Respondents"), by and through their undersigned counsel, hereby move pursuant to Rule 210(c) of the South Carolina Rules of Appellate Procedure to amend their Designation of Matter to be included in the Record on Appeal.

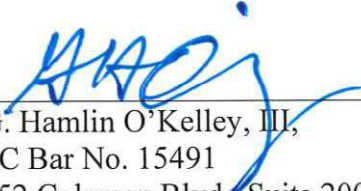
Counsel requests that all timelines be held in abeyance while the Court considers this request.

Respectfully submitted.

Mt. Pleasant, South Carolina

BUIST BYARS & TAYLOR, LLC

January 14, 2025


G. Hamlin O'Kelley, III,
SC Bar No. 15491
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Attorney for the Respondents

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PROOF OF SERVICE

I certify that I have served the Respondents' Motion to Amend their Designation of Matter to be included in the Record on Appeal by depositing a copy of same in Via Email jfletcher@barnwell-whaley.com and mbarfield@barnwell-whaley.com and Via US Mail, addressed to John W. Fletcher and K. Michael Barfield, Barnwell Whaley Patterson & Helms, LLC, 211 King Street, PO Drawer H, Charleston, SC 29402.

Mt. Pleasant, South Carolina

January 14, 2025

BUIST BYARS & TAYLOR, LLC



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January 14, 2025

VIA EMAIL: ctappfilings@sccourts.org
AND US MAIL
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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*RE: Virgie C. Simmons Family, LLC v Limetrade, LLC et al.,
C/A No.: 2019-CP-18-02217
Appellate Case No. 2024-000834
Client File No.: 1374.0004*

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the Respondents' Motion to Amend their Designation of Matter to be included in the Record on Appeal and an original and one (1) copy of their Proof of Service in the above-referenced matter along with the filing fee in the amount of \$50.00.

Should you have any questions, please feel free to contact me.

With kindest regards, I remain

Yours very truly,

G. Hamlin O'Kelley, III

GHOIII/atd
Enclosures

Cc: (w/ Encl. Via Email and US Mail)
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K. Michael Barfield, Esq. (mbarfield@barnwell-whaley.com)