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Jan 23 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
CIRCUIT COURT

Brian M. Gibbons, Circuit Court Judge

Circuit Court Case No.: 2022-CP-20-00104
Appellate Case No. 2023-001451

Bertha Goins,Respondent,

v.

Jenkinsville Water Co., Inc.,Appellant.

CONSENT MOTION TO FILE AN AMENDED RECORD ON APPEAL

Appellant hereby moves to amend the Record on Appeal due to a missing pleading leading to pages being indexed and numbered incorrectly. The grounds for this motion are as follows:

1. Appellant's counsel filed their Record on Appeal on or about November 26, 2024.
2. Respondent's counsel brought this error to Appellant counsels' attention via email on December 10, 2024.

For the reasons stated above, Appellant respectfully moves this Court for an order allowing them to amend their previously filed Record on Appeal with the CONSENT OF RESPONDENT'S COUNSEL.

Respectfully submitted,

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

2309 Devine Street

Columbia, South Carolina 29205

jgoodwyn@goodwynlaw.com

(803) 251-4517

(803) 251-4527 Facsimile

Attorney for Appellant

Columbia, South Carolina
January 23, 2025

WE CONSENT:

/s/ SYDNEY J. DOUGLAS

Sydney J. Douglas, SC Bar No. 105744

Austin T. Reed, SC Bar No. 102808

Daniel C. Plyler, SC Bar No. 72671

H. Thomas Morgan, Jr., SC Bar No. 73585

Shanon Peake, SC Bar No. 102723

Smith Robinson, LLC

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Counsel for Respondent

From: Sydney J. Douglas <sydney.douglas@smithrobinsonlaw.com>
Sent: Thursday, January 23, 2025 2:31 PM
To: cchase goodwynlaw.com; jgoodwyn goodwynlaw.com
Cc: Tommy Morgan; Shanon Peake; Daniel C. Plyler; Austin Reed; Sherry Roth
Subject: RE: Bertha Goins v. Jenkinsville Water Company Inc. - Appellate Case No. 2023-001451
Attachments: draft Consent Motion to File Amend Record on Appeal, 2.docx

Good afternoon,

We've made a couple edits to the proposed consent motion – please let me know if you have any questions.

Please let us know if Mr. Goodwyn requests any additional edits, otherwise, you have Respondent's consent to file the revised consent motion as attached here.

Thank you,
Sydney Douglas

SMITH ROBINSON
Forward thinking. Results driven.

Columbia

3200 Devine Street
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Camden: 803.432.1992

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Sydney J. Douglas

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From: cchase goodwynlaw.com <cchase@goodwynlaw.com>
Sent: Monday, January 20, 2025 11:48 AM
To: Sydney J. Douglas <sydney.douglas@smithrobinsonlaw.com>; jgoodwyn goodwynlaw.com <jgoodwyn@goodwynlaw.com>
Cc: Tommy Morgan <tommy.morgan@smithrobinsonlaw.com>; Shanon Peake <shanon.peake@smithrobinsonlaw.com>; Daniel C. Plyler <Daniel.Plyler@smithrobinsonlaw.com>; Austin Reed <austin.reed@smithrobinsonlaw.com>; Sherry Roth <Sherry.roth@smithrobinsonlaw.com>
Subject: RE: Bertha Goins v. Jenkinsville Water Company Inc. - Appellate Case No. 2023-001451

Good morning Ms. Douglas –

Following up on the attached. Please advise at your convenience.

Thank you.

Ms. Cesairé Nicole Chase, Legal Assistant
Goodwyn Law Firm, LLC
2309 Devine Street

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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FAIRFIELD COUNTY
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Case No. 2022-CP-20-00104
Appellate Case No.: 2023-001451

Bertha Goins,.....Respondent,

v.

Jenkinsville Water Co., Inc.,.....Appellant.

PROOF OF SERVICE

I certify that I have served a copy of the **Consent Motion to File an Amended Record on Appeal**, upon; Sydney J. Douglas, Esquire, Austin T. Reed, Esquire; Daniel C. Plyler, Esquire; and H. Thomas Morgan, Jr., Esquire, Attorneys for Respondent, at the address(es) below by E-mailing a copy of same, on January 23, 2025.

Sydney J. Douglas, Esquire
Austin T. Reed, Esquire
Daniel C. Plyler, Esquire
H. Thomas Morgan, Jr., Esquire
Smith Robinson, LLC
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sydney.douglas@smithrobinsonlaw.com
austin.reed@smithrobinsonlaw.com
daniel.plyler@smithrobinsonlaw.com
tommy.morgan@smithrobinsonlaw.com

SIGNATURE TO FOLLOW ON NEXT PAGE

Respectfully submitted,

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

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Attorney for Appellant

Columbia, South Carolina
January 23, 2025

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Jefferson D. Turnipseed**

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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

January 23, 2025

VIA E-FILING AND MAIL

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

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SC Court of Appeals

RE: ***Bertha Goins v. Jenkinsville Water Company, Inc.***
Civil Action No.: 2022-CP-20-00104
Appellate Case No.: 2023-001451
Our File No.: 3550-0001

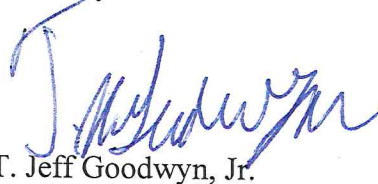
Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of the Consent Motion to File an Amended Record on Appeal, along with a Proof of Service, in regards to the above referenced matter. Please file the original and return a filed copy of same to me via email. Additionally, please note the \$50.00 filing fee has been placed in today's mail.

As evidenced in the Proof of Service, I have served all interested parties, with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Austin T. Reed, Esquire
Daniel C. Plyler, Esquire
Sydney J. Douglas, Esquire
H. Thomas Morgan, Jr., Esquire
(all via email)