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**Jun 03 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
The Hon. Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2023-000718

DARLEEN RASH, Individually and as Personal Representative  
for the ESTATE OF BRONSON HARLEY RASH.....Appellant-Respondent

v.

DOMINION ENERGY (formerly SOUTH CAROLINA  
ELECTRIC & GAS COMPANY); ANTHONY M. AKBAR;  
AND PAUL QUATTLEBAUM,.....Respondent-Appellant

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**MOTION TO SUPPLEMENT THE RECORD**

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Pursuant to Rule 212, SCACR, Appellant-Respondent Darleen Rash respectfully requests the Court to supplement the record on appeal to include copies of the videos identified as Defendant Akbar’s Exhibit #94 and Defendant Akbar’s Exhibit #95. These exhibits were subject to a transportation order issued by this Court on May 21, 2025 requiring the exhibits to be released and transported by May 30, 2025.

During oral argument before this Court on June 3, 2025, the Court informed the undersigned counsel that the exhibits had not been received, and the undersigned made an oral motion to supplement the record with these exhibits. The Court asked counsel for Respondent-Appellants whether they objected, and no party objected. This written motion is made for the

Court's formal consideration of the oral motion. *See Bazen v. Bazen*, 837 S.E.2d 23 (S.C. 2019) (noting the Court's granting, by written order, counsel's oral motion to supplement the record).

Supplementing the record to include these two videos is appropriate and necessary in this case because it addresses and clarifies a matter that was the subject of direct inquiry from the Court during the oral argument. It also enables the Court to view the videos that counsel was unaware had not been received pursuant to the transportation order. Accordingly, Appellant-Respondent requests the Court grant the motion to supplement the record on appeal to ensure a complete understanding of this issue on appeal.

Respectfully submitted,

*s/Brian Critzer*

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June 3, 2025  
Columbia, South Carolina

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**PROOF OF SERVICE**

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This is to certify that I have this date caused to be served a true and correct copy of the foregoing **Motion to Supplement the Record** on counsel in this action by email, pursuant to the Supreme Court’s Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules dated April 24, 2024, by electronic mail, addressed as follows:

David S. Cox – [dcox@barnwell-whaley.com](mailto:dcox@barnwell-whaley.com)

M. Dawes Cooke, Jr. - [mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)

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Respectfully submitted,

*s/Brian Critzer*

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June 3, 2025

Columbia, South Carolina

W Y C H E

Attorneys at Law

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SC Court of Appeals

June 3, 2025

VIA EMAIL

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

Re: *Darleen Rash, Individually and as Personal Representative for the Estate of Bronson Harley Rash v. Dominion Energy (formerly South Carolina Electric & Gas), et al.*  
Case No. 2023-000718

Dear Ms. Kitchings:

Enclosed is Appellant-Respondent's Motion to Supplement the Record with exhibits and Proof of Service in the above matter. We ask that you please file these documents and return an electronic copy bearing the Court's file stamp.

Our firm's check in the amount of \$50.00 representing the filing fee for this Motion will be hand delivered to your office.

All counsel of record are being served with the above via electronic mail.

Sincerely,



Brian Critzer  
[bcritzer@wyche.com](mailto:bcritzer@wyche.com)

Enclosures

cc: Counsel of Record (via email only, w/enclosures)

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