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October 16, 2025

RECEIVED  
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S.C. SUPREME COURT

**Via Electronic Filing**

The Honorable Patricia A. Howard  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

Re: Corrected Motion to Supplement  
Appellate Case Nos. 2024-001423 and 2024-001499

Dear Madam Clerk:

On October 2, 2025, our clients filed a Motion for Leave to Supplement the Sanctions Record in the above-referenced matters pending before the Supreme Court. We noticed today that there was a typographical error on Page 15 of that motion with respect to the first bullet point in the listing on that page.

In particular, the motion indicated that the *Park* tort case was mediated on May 24, 2021, and that Mr. Park secured releases from all other beneficiaries to the Park Estate on May 21 and May 22, 2021. That was not correct. As the materials included in the Third Supplemental Appendix reveal, Mr. Park obtained releases from the other potential beneficiaries of the Estate on May 21 and 22, 2022, just days before the mediation on May 24, 2022. Counsel for the *Park* plaintiff then emailed the circuit court on June 3, 2022—10 days after the mediation—to inform the court that *Park* was “fully resolved.” (3d Supp. App. 182, 183, 198, 200–203.)

We apologize for the error and have attached to this email a corrected motion that corrects the year listed in that bullet point. We appreciate the Court’s consideration of this letter and the attached amended motion. If we can provide any additional materials or information, please do not hesitate to call on us.

Best regards,

/s/ M. Todd Carroll

cc: All Counsel of Record