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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Alexander S. Macaulay, Circuit Court Judge

Civil Action No.: 2005-CP-37-00788

RECEIVED
NOV 14 2013
SC Court of Appeals

Tri-County Development, Inc.,
Jeff Gray and Melinda Holbrooks,.....Respondents

v.

Christopher A. Pierce,.....Appellant

APPELLANT’S MOTION TO SUPPLEMENT RECORD ON APPEAL

Appellant hereby moves to supplement the record on appeal to include selections from the transcript from the summary judgment hearing as cited on pages 14 and 17 of Appellant’s initial brief and deposition excerpts of the deposition transcript of Chris Pierce cited on page 30 of Appellant’s Initial Brief. Counsel for Appellant has consulted with Counsel for Respondent regarding these additions and he does object to the addition of Chris Pierce’s deposition testimony, but does not object to the inclusion of the summary judgment transcript.

Since the Record on Appeal would not be finalized if this motion is granted, Appellant also requests that the deadline to file its final briefs be stayed until this motion is ruled on and the Record of Appeal is finalized. Counsel for Appellant has consulted

with Counsel for Respondent regarding the request for an extension to file the final brief and he has no objection to this request.

GOODWYN LAW FIRM, LLC



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Attorneys for Appellant

November 14, 2013

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v.

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PROOF OF SERVICE

I certify that I have served **Appellant's Motion to Supplement Record on Appeal** on Thomas E. Dudley, III, Esquire, Counsel for the Respondents at the address below by depositing a copy of same in the United States Mail, postage prepaid, on November 14, 2013.

Thomas E. Dudley, III, Esquire
Kenison, Dudley & Crawford, LLC
704 East McBee Avenue
Greenville, SC 29601


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November 14, 2013

VIA HAND DELIVERY

Jenny Abbott Kitchings, Clerk of Court
The South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: *Tri-County Development et. al., Jeff Gray and Melinda Holbrooks v. Christopher A. Pierce*
Civil Action No.: 2005-CP-37-00788
Case No.: 2011202946
Our File No.: 3500-0014

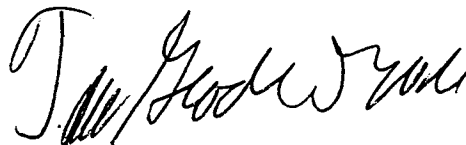
Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of Appellant's Motion to Supplement Record on Appeal along with a check in the amount of \$25.00 for the filing fee in regard to the above-referenced matter. Please return a clocked-in copy to the courier.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of same on Thomas E. Dudley, III, Esquire, counsel for the Respondents.

Thank you and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Thomas E. Dudley, III, Esquire
Chris Pierce

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