

CONSOLIDATED FILING PACKET

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

James M. Harley, Appellant

v.

South Carolina Department of Employment and Workforce;
Bradshaw Automotive Group, Inc., Respondents

Appellate Case No. 2024-001795

RECEIVED

Feb 03 2026

SC Court of Appeals

TABLE OF CONTENTS – CONSOLIDATED FILING

1. Motion to Supplement and Cure Record on Appeal (Rule 210(c), SCACR)
2. Notice of Cure Completed
3. Consolidated Index to Supplemental Record on Appeal (full record mailed for filing)
4. Supplemental Sealed Medical Declaration (mailed under seal)
5. Cover Letter to Clerk

MOTION TO SUPPLEMENT AND CURE RECORD ON APPEAL

Filed pursuant to Rule 210(c), SCACR

Appellant respectfully moves the Court for leave to supplement and cure the Record on Appeal.

Facts and Basis:

1. The Record on Appeal filed January 6, 2026, was incomplete due to inadvertent omission of the certified administrative record relied upon by the Administrative Law Court.
2. The omitted materials are identical to the administrative record previously litigated.



3. During the filing period, Appellant suffered medical symptoms followed by undergoing invasive medical procedures and recovery, which materially impaired document management.
4. Upon recovery, the complete administrative record was promptly located.
5. Respondents suffer no prejudice, as the record is unchanged and already known.

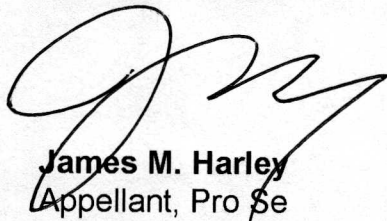
Legal Argument:

- Rule 210(c) SCACR allows supplementation and correction.
- Dismissal for a curable defect is disfavored when good cause exists and the omission has been remedied.

Relief Requested:

- Grant leave to supplement and cure the Record on Appeal
- Accept the complete administrative record
- Deny Respondents' Motion to Dismiss as moot or premature
- Reset briefing deadlines as necessary

Respectfully submitted,



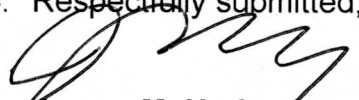
James M. Harley
Appellant, Pro Se

Date: February 2nd, 2026

NOTICE OF CURE COMPLETED

Appellant notifies the Court:

1. The complete administrative record has now been filed and served.
2. Omission occurred due to temporary medical limitations.
3. Acceptance promotes judicial efficiency and renders moot Respondents' Motion to Dismiss.
4. Respectfully submitted,



James M. Harley
Appellant, Pro Se
Date: February 2nd, 2026

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CONSOLIDATED INDEX TO SUPPLEMENTAL RECORD

Volume I – Pleadings and Procedural History

1. Notice of Appeal (Feb. 19, 2021)
2. ALC Notice of Assignment (Feb. 24, 2021)
3. Administrative Hearing Notices
4. Procedural Orders

Volume II – Evidentiary Record

5. Certified ALC Record filed Mar. 16, 2021
6. Exhibits admitted at hearing
7. Documentary evidence relied upon

Volume III – Briefing and Final Order

8. Appellant's Brief to ALC (Feb. 22, 2023)
9. Respondents' Joint Brief to ALC (Mar. 14, 2024)
10. ALC Order Affirming Panel (Sept. 19, 2024)

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CERTIFICATE OF SERVICE

I certify that on February 2nd, 2026, I served a true and correct copy of the following:

Consolidated Filing Packet;

Motion to Supplement and Cure Record on Appeal;

Notice of Cure Completed;

Consolidated Index to Supplemental Record as well as the Record on Appeal.

Respectfully,



James M. Harley

Appellant, Pro Se

Valerie M. McMellan, Esq.
SCDEW, P.O. Box 8597
Columbia, South Carolina 29202

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SC Court of Appeals

Sarah M. Gable, Esq.
Ogletree Deakins Law Firm
2142 Boyce Street, Suite 401
Columbia, South Carolina 29201

Subject: Service of Supplemental Record on Appeal – Harley v. SC DEW, Case No. 2024-001795

Dear Counsel,

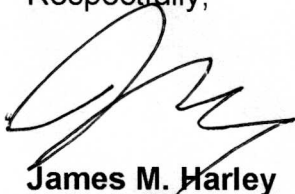
Please find attached a copy of the **complete administrative Record on Appeal** for *James M. Harley v. South Carolina Department of Employment and Workforce and Bradshaw Automotive Group, Inc.*, Appellate Case No. 2024-001795.

This filing **supplements and cures** the previously submitted record and includes the consolidated index. The record was inadvertently omitted due to Appellant's medical symptoms followed by undergoing invasive medical procedures and recovery, and has now been fully located and filed with the Court.

We respectfully submit this supplemental filing for service on all parties, in accordance with Rule 210(c), SCACR.

Thank you for your attention.

Respectfully,



James M. Harley
Appellant, Pro Se
Date: February 2nd, 2026

February 2nd, 2026

The Honorable Jenny Abbott Kitchings

Clerk of the South Carolina Court of Appeals

By Mail and except for the record and medical declaration by
ctappfilings@sccourts.org

Re: James M. Harley v. SC DEW, App. Case No. 2024-001795

Dear Clerk,

Enclosed please find:

1. Motion to Supplement and Cure Record on Appeal
2. Notice of Cure Completed
3. Consolidated Index to Supplemental Record
4. Supplemental Sealed Medical Declaration

The complete administrative Record on Appeal has been mailed for filing and served. This filing cures the prior inadvertent omission and puts the case in proper posture for appellate review.

Please note that a copy of this supplemental filing, including the complete administrative Record on Appeal, Motion to Supplement and Cure, Notice of Cure Completed, and Consolidated Index, has been **served on all counsel of record** on the same day as this letter.

Thank you for your assistance.

Respectfully,



James M. Harley
Appellant, Pro Se