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Oct 07 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Charles B. Simmons, Jr., Circuit Court Judge

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Appellate Case No. 2026-000524

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Timothy Jones as the Personal Representative for Dewitt Jones.....Appellant,

v.

Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A.  
Flanagan, Jr., and Marion L. Snyder..... Respondents.

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**RESPONDENTS' CONSENT MOTION FOR LEAVE TO FILE AND SERVE AN  
AMENDED INITIAL BRIEF AND AMENDED DESIGNATION OF MATTER FOR  
INCLUSION IN THE RECORD ON APPEAL**

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Adam C. Bach (S.C. Bar #74885)  
TONNSEN BACH, LLC  
1306 South Church Street  
Greenville, SC 29605  
Telephone: (864) 236-5013  
Facsimile: (864) 312-4191  
*abach@tonnsenbach.com*

**Attorneys for Respondents**

**RESPONDENTS' CONSENT MOTION FOR LEAVE TO FILE AND SERVE AN  
AMENDED INITIAL BRIEF AND AMENDED DESIGNATION OF MATTER FOR  
INCLUSION IN THE RECORD ON APPEAL**

NOW COMES Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder ("Respondents"), by and through their undersigned counsel, pursuant to Rule 240, SCACR, and move for leave to file and serve an Amended Initial Brief of Respondents ("Amended Initial Brief") and an Amended Designation of Matter for Inclusion in the Record on Appeal ("Amended Designation of Matter"). In support of this Motion, Respondents state as follows:

1. On September 11, 2026, Respondents served and filed their Initial Brief of Respondents ("Initial Brief") and their Designation of Matter for Inclusion in the Record on Appeal ("Designation of Matter").
2. By email dated September 16, 2026, counsel for Appellant raised a concern that Respondents' Designation of Matter and Initial Brief may include matters that were not presented to the trial court, and requested that Respondents review and amend their filings accordingly.
3. Respondents have reviewed their Designation of Matter and Initial Brief and prepared an Amended Designation of Matter and Amended Initial Brief to include only materials presented to the trial court.
4. Respondents move this Court for leave to file and serve their Amended Initial Brief and Amended Designation of Matter, pursuant to Rules 208, 209, 210, and 240, SCACR.
5. Appellant consents to this Motion.

For all of the foregoing reasons, Respondents Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder move this Court for an Order permitting

Respondents to file and serve their Amended Initial Brief and Amended Designation of Matter for Inclusion in the Record on Appeal; and granting such other and further relief as the Court deems just and proper.

**WE CONSENT:**

TONNSEN BACH, LLC

s/Adam C. Bach

Adam C. Bach (S.C. Bar #74885)

1306 South Church Street

Greenville, SC 29605

Telephone: (864) 236-5013

Facsimile: (864) 312-4191

*abach@tonnsenbach.com*

**Attorneys for Respondents**

BARNWELL WHALEY PATTERSON & HELMS, LLC

s/M. Dawes Cooke, Jr.

M. Dawes Cooke, Jr. (S.C. Bar #1376)

John W. Fletcher (S.C. Bar #69550)

211 King Street, Suite 300 (29401)

P. O. Drawer H

Charleston, SC 29402

Telephone: (843) 577-7700

Facsimile: (843) 577-7708

**Attorneys for Appellant**

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**PROOF OF SERVICE**

I certify that I have served **RESPONDENTS' CONSENT MOTION FOR LEAVE TO FILE AND SERVE AN AMENDED INITIAL BRIEF AND AMENDED DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL** on counsel for the above-referenced Appellants by email in accordance with the South Carolina Supreme Court's Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules on October 7, 2026, addressed as follows:

M. Dawes Cooke, Jr. (S.C. Bar #1376) - [mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com)  
John W. Fletcher (S.C. Bar #69550) - [jfletcher@barnwell-whaley.com](mailto:jfletcher@barnwell-whaley.com)  
211 King Street, Suite 300 (29401)  
P. O. Drawer H  
Charleston, SC 29402  
Telephone: (843) 577-7700  
Facsimile: (843) 577-7708

s/Adam C. Bach  
Adam C. Bach (S.C. Bar #74885)  
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Greenville, SC 29605  
Telephone: (864) 236-5013  
Facsimile: (864) 312-4191  
[abach@tonnsenbach.com](mailto:abach@tonnsenbach.com)