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JAN 15 2014

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen, Circuit Court Judge

Case No. 2011-CP-07-00013

Maureen T. Coffey,..... Respondent,

v.

Community Services Associates, Inc., and
George F. Breed, Jr. Appellants.

**MOTION TO CORRECT AND SUPPLEMENT
RECORD ON APPEAL**

Pursuant to Rule 210, SCACR, Appellants move this Court to order that certain corrections be made to the Record on Appeal ("Record"). Pages are missing in the Record for four exhibits presented to the circuit court that were designated by the parties. As a result, those exhibits are incomplete in the Record before this Court. Appellants hereby move to have them included at the end of the Record as follows:

- Plaintiff's Exhibit 8 – 1885
- Plaintiff's Exhibit 18 – 1886-1888
- Defendants' Exhibit 4 – 1889-1895
- Defendants' Exhibit 5 – 1896-1897.

In addition, the Index to the Record does not contain a detailed listing that shows the pages on which direct, cross, redirect and recross examination of witnesses begins in the Record as required by Rule 210(e), SCACR. As a result, pursuant to Rule 212, SCACR, Appellants move to supplement the Record with the index to the hearing testimony attached hereto as pages 1898-1901.

Appellants further request this Court to order that the Final Briefs in this appeal will not be due until the Record on Appeal has been properly corrected and supplemented pursuant to this Motion.

This Motion conforms with Rule 240, SCACR. Counsel for Respondent has consented to this Motion.

Respectfully submitted,

McANGUS GOUDELOCK & COURIE LLC



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Attorneys for Appellant George F. Breed, Jr.

January 13, 2014

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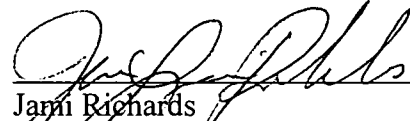
PROOF OF SERVICE

I certify that I served the Appellants' **Motion to Correct and Supplement Record on Appeal** on Maureen T. Coffey, by depositing a copy of it in the United States Mail, postage prepaid, on the 13nd day of January, 2014, addressed to her attorney and other counsel of record, as follows:

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January 13, 2014

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SC Court of Appeals

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, South Carolina 29211

RE: Maureen T. Coffey v. Community Services Associates, Inc. and
George F. Breed, Jr.
Case No.: 2011-CP-07-00013
Our File No.: 20587.12019
Appeal Tracking No.: 2012-213252

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellants' Motion to Correct and Supplement Record on Appeal and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return the clocked-in copies in the enclosed stamped, self-addressed envelope. Also, enclosed is our firm's check in the amount of \$25 for filing the motion.

Counsel for Respondent has consented to this Motion. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Helen F. Hiser

Enclosures

cc: C. Mitchell Brown, Esq.
Robert V. Mathison, Jr., Esq.
Mark Barrow, Esq.
William Calhoun, Esq.
Andrew S. Halio, Esq.

The Honorable Jenny Abbott Kitchings
January 13, 2014
Page 2

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