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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Frank R. Addy, Jr., Circuit Court Judge

Case No. 2012-CP-32-3208

**RECEIVED**

APR 08 2014

**SC Court of Appeals**

Raymond Carter, ..... Appellant,

v.

Donnie Myers, Solicitor, Lexington County; Tracey Carroll,  
Assistant Solicitor, Lexington County; Brian Buck,  
Irmo Police Department; Scott Franklin, Irmo Police Department;  
Timothy E. Stephenson, South Carolina Law Enforcement (SLED);  
George White, Ex father-in-law; Tammy Carter,  
(AKA Tammy Scrogam), Ex wife; Barbara Keadle  
(AKA Diane Hinkle) Investigator LDSS; Francis Ross, LDSS;  
Paulette Jolly, Guardian ad Litem, in their official and individual capacities, ..... Defendants,

Of whom, Donnie Myers, Solicitor, Lexington County;  
Brian Buck, Irmo Police Department; Scott Franklin, Irmo Police  
Department, are, ..... Respondents.

**MOTION TO CORRECT THE RECORD ON APPEAL**

The Respondents respectfully move this Court for an Order requiring the Appellant to file and serve a corrected Record on Appeal that fully complies with the South Carolina Appellate Court Rules and includes only documents designated by the parties for inclusion in the Record on Appeal and fully complies with Supreme Court Order relating to the redaction of personal


data identifiers and other sensitive information in documents filed with the South Carolina appellate courts.

The Respondents' motion is addressed in greater detail in the supporting memorandum filed herewith.

The Respondents request that the Court hold all deadlines in abeyance until the issue regarding the Record on Appeal is resolved.

In addition, the Respondent Myers does not waive or withdraw the relief requested in his Motion to Dismiss Appeal which remains pending per the Order filed March 18, 2014.

DAVIDSON & LINDEMANN, P.A.

BY: 

ANDREW F. LINDEMANN  
WILLIAM H. DAVIDSON, II  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Respondent Donald V. Myers*

MORRISON LAW FIRM, LLC

BY: 

DAVID L. MORRISON  
KASSI B. SANDIFER  
7453 Irmo Drive, Suite B  
Columbia, South Carolina 29212  
(803) 661-6285

*Counsel for Respondents Brian Buck and  
Scott Franklin*

Columbia, South Carolina

April 8, 2014

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Paulette Jolly, Guardian ad Litem, in their official and individual capacities, ..... Defendants,

Of whom, Donnie Myers, Solicitor, Lexington County; Tracey Carroll,  
Brian Buck, Irmo Police Department; Scott Franklin, Irmo Police  
Department, are, ..... Respondents.

**CERTIFICATE OF SERVICE**

The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Respondent Donnie Myers, does hereby certify that service of the below listed documents in the above-captioned matter was made upon the *pro se* parties and upon all known counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 8th day of April 2014:

1. Motion to Re-Print the Record on Appeal

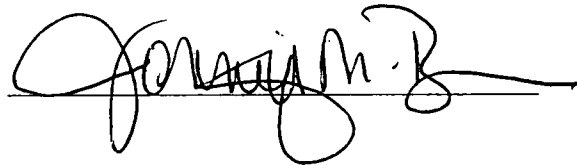
2. Memorandum in Support of Motion to Re-Print the Record on Appeal

Mr. Raymond W. Carter  
2219 Leesburg Road  
Columbia, South Carolina 29209-3055

David L. Morrison, Esquire  
Morrison Law Firm, LLC  
7453 Irmo Drive - Suite B  
Columbia, South Carolina 29212

Ms. Tammy A. Kidd  
1246 West Blue Lick Road  
Shepherdsville, Kentucky 40165

Mr. Timothy E. Stephenson  
709 Old Trolley Road  
Summerville, South Carolina 29485

A handwritten signature in black ink, appearing to read "Timothy E. Stephenson", written over a horizontal line.

# DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II  
Andrew F. Lindemann\*  
James M. Davis, Jr.†  
Robert D. Garfield  
Michael B. Wren

1611 Devonshire Drive, Second Floor  
Post Office Box 8568  
Columbia, South Carolina 29202-8568  
Telephone: (803) 806-8222  
Facsimile: (803) 806-8855  
www.dml-law.com

Daniel C. Plyler  
Joel S. Hughes  
Justin T. Bagwell  
David A. DeMasters  
Steven R. Spreuwers  
Todd R. Flippin

\*Also Admitted In North Carolina  
†Certified Mediator

April 8, 2014

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

## **Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Edgar Brown Building  
1205 Pendleton Street  
Columbia, South Carolina 29201

RE: Raymond Carter v. Donnie Myers, Solicitor, *et al.*  
Appeal Tracking Number: 2013-000449  
Civil Action Number: 2012-CP-32-3208  
Claim Numbers: 88832, 88837, 88839 and 88974  
Our File Number: 103.9071

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**SC Court of Appeals**

Dear Ms. Kitchings:

Please find enclosed for filing the originals and seven copies each of the **Motion to Re-Print the Record on Appeal** and the **Memorandum in Support of Motion to Re-Print the Record on Appeal** with regard to the above referenced matter. Please file the originals and return a clocked-in copy of each document to me by way of my courier. I have also enclosed my firm's \$25.00 check for the filing fee.

By copy of this letter, I am serving copies on all *pro se* parties and all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
April 8, 2014  
Page Two

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cc: (w/ Enclosures)

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Kassi B. Sandifer, Esquire  
Morrison Law Firm  
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