

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM PICKENS COUNTY COURT OF COMMON PLEAS  
Charles B. Simmons, Jr., Special Referee

Case No. 2008-CP-39-56  
Appellate Case No. 2013-002154

Palmetto State Enterprises,  
LLC,

Respondent,

v.

Clegg Lamar Greene a/k/a  
Lamar Greene, Juleene  
Greene, a/k/a Julie Greene, J  
& P Enterprises of the  
Carolinas, Inc., and Gaston  
Engineering, Inc.,

Defendants,

Of Whom

J & P Enterprises of the  
Carolinas, Inc. is the

Appellant.

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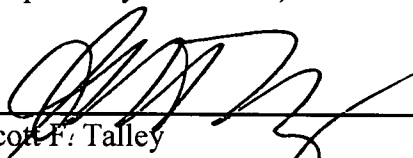
MAY 02 2014

**SC Court of Appeals**

**APPELLANT'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL RECORD**

COMES NOW Appellant J & P Enterprises of the Carolinas, Inc. ("Appellant") and moves the Court for leave to file a Supplemental Record on Appeal. The purpose of this Motion is not for delay, but to correct an error in the current Record on Appeal. As the Record on Appeal is rather lengthy and consists of over six hundred pages, Appellant moves the Court for leave to file a Supplemental Record on Appeal to include the correct Plaintiff's Trial Exhibit No. 12, Deposition of Ron West. Appellant has consulted with David Price, attorney for Respondent, and Mr. Price has no objections to the filing of a Supplemental Record on Appeal with the proper Trial Exhibit No. 12. Thus, Appellant respectfully requests the Court grant this its Motion for Leave to File Supplemental Record including the proper Plaintiff's Trial Exhibit No. 12.

Respectfully Submitted,



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Scott F. Talley

**TALLEY LAW FIRM, P.A.**

2500 Winchester Place, Suite 100

Spartanburg, South Carolina 29301

(864) 595-2966

Attorney for Appellant

April 28, 2014

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**CERTIFICATE OF SERVICE**

**IT IS HEREBY CERTIFIED** that a copy of the foregoing **Motion for Leave to File Supplemental Record** in this action was served upon Counsel for Respondent, Dan R. Price, Jr., and Dan Hunt, Personal Representative for the Estate of Lamar Greene, by placing copies of same in the United States Mail this date, with sufficient postage affixed thereto, addressed as follows:

David R. Price, Jr.  
P. O. Box 2446  
Greenville, SC 29602

Dan Hunt  
502 North A Street  
Easley, SC 29640

April 28, 2014

  
\_\_\_\_\_  
Scott F. Talley  
**TALLEY LAW FIRM, P.A.**  
2500 Winchester Place, Suite 100  
Spartanburg, South Carolina 29301  
(864) 595-2966  
Attorney for Appellant

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**SC Court of Appeals**

**APPENDIX TO SUPPLEMENTAL RECORD ON APPEAL**

19. Plaintiff's Trial Exhibit No. 12, Deposition of Ron West.....612

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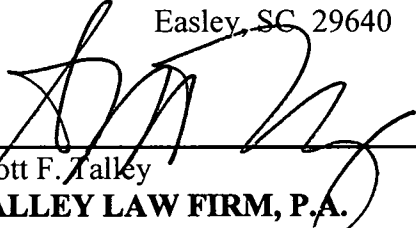
**CERTIFICATE OF SERVICE**

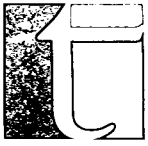
**IT IS HEREBY CERTIFIED** that a copy of the foregoing **Appendix to Supplemental Record on Appeal** in this action was served upon Counsel for Respondent, Dan R. Price, Jr., and Dan Hunt, Personal Representative for the Estate of Lamar Greene, by placing copies of same in the United States Mail this date, with sufficient postage affixed thereto, addressed as follows:

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P. O. Box 2446  
Greenville, SC 29602

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502 North A Street  
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Scott F. Talley  
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(864) 595-2966  
Attorney for Appellant



**TALLEY** Law Firm, P.A.

Scott F. Talley  
Joshua J. Hudson\*  
Lauren W. Barnwell

\*Also admitted in Kentucky

April 28, 2014

Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

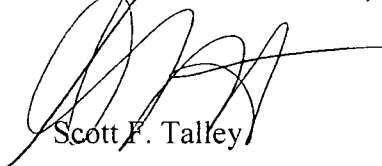
Re: Palmetto State Enterprises, LLC v. Clegg Lamar Greene a/k/a Lamar Greene,  
et al.  
Case No. 2013-002154

Dear Ms. Kitchings:

Enclosed please find the original and six (6) copies of Appellant's Motion for Leave to File Supplemental Record together with a Certificate of Service; and, Appendix to Supplemental Record on Appeal together with a Certificate of Service for same. By copy of this letter to David R. Price, Jr., Attorney for Respondent and Dan Hunt, Personal Representative for the Estate of Lamar Greene, I am serving them with a copy of same. If you have any questions or concerns, please let me know.

With kind regards, I remain

Yours very truly,  
**TALLEY LAW FIRM, P.A.**



Scott F. Talley

/jbm

Enclosures

Copy to: David R. Price, Jr.  
Dan Hunt

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