



Reply To

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August 19, 2014

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' Second 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.
Celeste T. Jones, Esq.
Kelly M. Jolley, Esq.
Thorne Barrett, Esq.
Benjamin E. Nicholson, V, Esq.

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
August 19, 2014
Page 2

Robert L. Widener, Esq.
John Nichols, Esq.
Claudia Cinardo, Arch Insurance Company
Carol Meriam, Esquire, Brownyard Claims Management, Inc.
Mr. George F. Breed, Jr.

27

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

173295

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.

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

Pursuant to Rule 210, SCACR, Appellants move this Court to order that one additional correction be made to the Record on Appeal ("Record"). One page is missing in the Record for the jury verdict form which was designated by the parties. As a result, that document is incomplete in the Record before this Court. Appellants hereby move to have the complete jury verdict form included at the end of the Record as follows:

Verdict Form -1904-1906.

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

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Respectfully submitted,

McANGUS GOUDELICK & COURIE LLC



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Attorneys for Appellant George F. Breed, Jr.

August 19, 2014

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.

**SECOND APPENDIX TO THE
RECORD ON APPEAL**

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William R. Calhoun, Jr., Esq.
Sweeny, Wingate Barrow, P.A.
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**ATTORNEYS FOR APPELLANT
GEORGE F. BREED, JR.**

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Attorney at Law
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Hilton Head Island, SC 29938-5271

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ATTORNEYS FOR RESPONDENT

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SC Court of Appeals

Index

Jury Verdict Form..... 1904-1906

Certificate of Counsel 1907-1908

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)
)
MAUREEN T. COFFEY,)
)
Plaintiff,)
)
v.)
)
COMMUNITY SERVICES ASSO-)
CIATES, INC. and GEORGE F.)
BREED, JR.)
)
Defendants.)
_____)

IN THE COURT OF COMMON PLEAS
(Case No. 2011-CP-07-00013)

VERDICT FORM

We, the jury find unanimously as follows:

1a. The plaintiff has proved by clear and convincing evidence that the defendant, *George F. Breed, Jr.*, published a false statement of fact of and concerning plaintiff.

yes
 no

1b. The plaintiff has proved by clear and convincing evidence that the defendant, *Community Services Associates, Inc.*, published a false statement of fact of and concerning plaintiff.

yes
 no

If no for both 1a & 1b, please sign and date the form and advise the court that a verdict has been reached.

2a. The plaintiff has proved by clear and convincing evidence that the defendant, *George F. Breed, Jr.*, published a statement concerning the Plaintiff with knowledge that it was false or with reckless disregard of its falsity.

yes
 no

2b. The plaintiff has proved by clear and convincing evidence that the defendant, *Community Services Associates, Inc.*, published a statement concerning the Plaintiff with knowledge that it was false or with reckless disregard of its falsity.

yes
 no

If no for both 2a & 2b, please sign and date the form and advise the court that a verdict has been reached.

3. The plaintiff has proved by a preponderance of the evidence that she has sustained special damages.

yes
 no

If yes, write the amount of special damages and proceed to question 4. If no, sign the form and advise the court that a verdict has been reached.

\$ 6,050.00 Special Damages

4. The plaintiff has proved by a preponderance of the evidence that she has sustained damage to her reputation/ general damages as a consequence of the defendants' publication.

yes
 no

If yes, write the amount of reputation/ general damages.

\$ 2,000,000.00 General Damages

If you answer question 3 yes, you may then consider punitive damages

5. The plaintiff has proved by clear and convincing evidence that the Plaintiff is entitled to punitive damages.

yes
 no

against George F. Breed, Jr.
 against Community Services Associates, Inc.
 against Community Services Associates, Inc. & George F. Breed, Jr.

If yes as to any of the Defendants, write the amount of punitive damages.

\$ 4,000,000.00 Punitive Damages

Daniel D. Golome
JURY FOREPERSON

JUNE 6, 2012
BEAUFORT, SC

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.

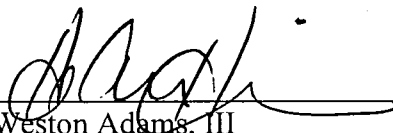
PROOF OF COMPLIANCE

The undersigned hereby certifies that the Second Appendix to Record on Appeal filed in this matter contains material proposed to be included by the parties to this matter and does not include any other material. The undersigned further certifies that the Record on Appeal filed in this matter complies with the South Carolina Supreme Court's August 13, 2007 Order re: Interim Guidance Regarding Personal Data Identifiers and Other Sensitive Information in Appellate Court Filings.

August 19, 2014

Respectfully submitted,

McANGUS GOUDELICK & COURIE LLC



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1907

SC Court of Appeals

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Attorneys for Appellant George F. Breed, Jr.