

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SEP 08 2014

SC Court of Appeals

APPEAL FROM AIKEN COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Presiding Judge

Case Nos. 2013-001909 & 2013-000826

William R. Ferrara.....Appellant

v.

Michael E. Hunt, Sheriff of Aiken County;
and Charles Cain in his individual capacity
as Deputy Sheriff.....Defendants

Of whom Michael E. Hunt is theRespondent,

AND

William R. Ferrara.....Appellant

v.

Michael E. Hunt, Sheriff of Aiken County;
and Charles Cain in his individual capacity
as Deputy Sheriff.....Defendants

Of whom Charles Cain is theRespondent.

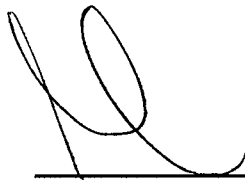
**REPLY TO RESPONDENT'S RETURN TO MOTION FOR EXTENSION
AND TO REMOVE PAGES FROM
RECORD ON APPEAL FILED WITH COURT**

The undersigned counsel for the Appellant, pursuant to the Order of this Court,
files and serves a reply to the Return of Respondent Hunt dated June 20, 2014. After

reviewing the Return, as well as the Lower Court file, the Appellant amends his Motion previously filed with this Court, pursuant to the contents of Respondent Hunt's Return.

The Appellant now moves for leave of the Court to remove the following pages inadvertently put into the Record on Appeal, but which were not part of the Lower Court record: Page 457, Pages 463-467; Page 470; Page 472-476; Page 520; Pages 526-528; Page 583-588; and Pages 590-591. In addition, page 1124 of the Record should be removed. Page 1124 is supposed to be page 25 of the Cain deposition but is in fact page 25 of the Ferrara deposition. Page 25 of the Cain deposition also appears in the Record on page 445 and therefore page 1124 can simply be removed from the Record on Appeal. The Appellant's Motion still seeks leave of the Court to physically remove these pages from the existing filed Record on Appeal to prevent Appellant from having to incur the cost of redoing the enormous Record on Appeal which consists of three (3) volumes and some 1280 pages.

WHEREFORE, Appellant respectfully prays that this Court grant Appellant's counsel leave of Court to remove the above-referenced pages from the filed Record on Appeal.



S. Jahue Moore, Esquire
John C. Bradley, Jr. Esquire
P.O. Box 5709
West Columbia, South Carolina 29171
(803) 796-9160

September 8, 2014

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PROOF OF SERVICE

I certify that I have served the Reply to Respondent's Return to Motion for Extension and to Remove Pages From Record on Appeal Filed with Court by mail, upon all counsel of record on September 8, 2014. I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below-listed document(s) upon

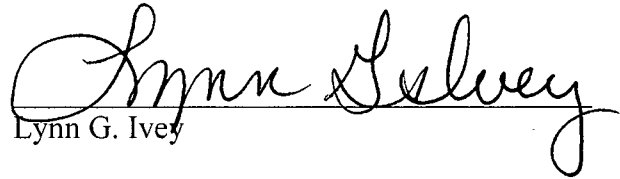
below-listed counsel, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, and by electronic mail transmission, addressed as listed below.

Andrew W. Lindemann, Esquire
Davidson & Lindemann, PA
P. O. Box 8568
Columbia, SC 29202-8568

Matthew B. Rosbrugh, Esquire
MBR Law, LLC
P.O. Box 292290
Columbia, SC 29229

DOCUMENT:

1. Reply to Respondent's Return to Motion for Extension and to Remove Pages From Record on Appeal Filed with Court



Lynn G. Ivey

West Columbia, South Carolina
September 8, 2014

September 8, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201
VIA HAND DELIVERY

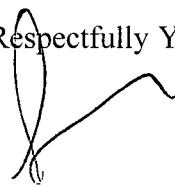
RE: William Ferrara vs. Michael E. Hunt, Sheriff of Aiken
County and Charles Cain in his individual capacity as
Deputy Sheriff
Ct. Appeals Case No. 2013-001909 & 2013-000826

Dear Ms. Kitchings:

Enclosed please find for filing in the above-referenced matter an original and eight copies of the Appellant's Reply to Respondent's Return to Motion for Extension and to Remove Pages from Record on Appeal Filed with Court. Please file the original and return two clocked-in copies to me via my courier.

By copy of this letter, I am serving a copy on all counsel. Thank you in advance for your assistance in this matter.

Respectfully Yours,



S. Jahue Moore

/lgi
Enclosures
cc: Andrew F. Lindemann, Esquire
Matthew B. Rosbrugh, Esquire

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