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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 the .....Respondent,

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 the .....Respondent.

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


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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.



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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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Of whom Charles Cain is the .....Respondent.

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

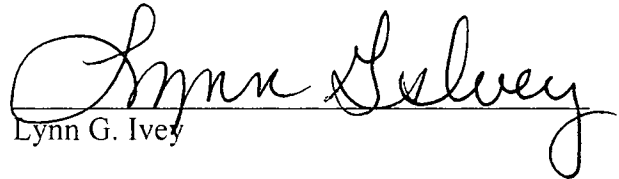
below-listed counsel, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, and by electronic mail transmission, addressed as listed below.

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



S. Jahue Moore†  
 J. Mark Taylor\*  
 C. Vance Stricklin, Jr.  
 James Edward Bradley†  
 Sheila McNair Robinson  
 Robert D. Hazel  
 Christian G. Spradley  
 C. David Sawyer, Jr.  
 William H. Edwards  
 Stanley L. Myers  
 Jane H. Downey\*  
 S. Jahue Moore, Jr.  
 John C. Bradley, Jr.  
 Melissa K. Moore  
 William B. Fortino  
 Ralph Nichols Riley, Jr.  
 M. Brooks Biediger  
 Amber Cary Fulmer  
 Sarah Taylor Cassidy  
 Margaret "Meg" Hazel  
 Billy C. Coleman (Ret.)

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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SEP 08 2014

**SC Court of Appeals**

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