

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. Spreeuwiers
Todd R. Flippin

Of Counsel
Kenneth P. Woodington

*Also Admitted In North Carolina
†Certified Mediator

October 24, 2014

Writer's Email: alindemann@dml-law.com

Ms. V. Claire Allen
Deputy Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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

RECEIVED

OCT 28 2014

SC Court of Appeals

Dear Ms. Allen:

I am in receipt of your letter dated October 22, 2014, inquiring whether I was served with the Amended Record on Appeal filed by the Appellant Raymond Carter in his attempt to comply with the Court's Order filed June 5, 2014. On July 21, 2014, I sent you the enclosed letter that advised the Court that the Amended Record on Appeal had been received but had not cured all of the deficiencies addressed by the Court's prior Order. In that letter, which was filed on July 22, 2014, I inquired whether the Court has accepted the Amended Record on Appeal for filing and whether the Court deems that Amended Record on Appeal as complying fully with the Order filed June 5, 2014.

Based upon your current letter dated October 22, 2014, I am assuming that the Court accepted the Amended Record on Appeal. Is it necessary for me to file another motion to correct the remaining deficiencies? Honestly, as I point out in my July 21st letter, the Amended Record on Appeal as served on the Respondents still does not include any sequential page numbering, and without that at a minimum, the Respondents still are unable to prepare their Final Briefs because they are unable to provide specific cites to the Record on Appeal. That is why I inquired whether the Amended Record on Appeal had actually been accepted for filing by the Court.

Please advise as to how the Court wants us to proceed at this point. Thank you for your assistance and any further guidance you can provide with this matter.

V. Claire Allen, Esquire
October 24, 2014
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Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/

Enclosure: July 21, 2014 letter

cc: (w/Enclosure)

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

David L. Morrison, Esquire
Kassi B. Sandifer, Esquire
Morrison Law Firm
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

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July 21, 2014

Of Counsel
Kenneth P. Woodington

Writer's Email: alindemann@dml-law.com

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Deputy Clerk of Court
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JUL 22 2014
SC Court of Appeals
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Dear Ms. Allen:

I am in receipt of the Amended Record on Appeal filed by the Appellant Raymond Carter in his attempt to comply with the Court's Order filed June 5, 2014. The purpose of this letter is to inquire whether the Court has accepted the Amended Record on Appeal for filing and whether the Court deems that Amended Record on Appeal as complying fully with the Order filed June 5, 2014.

I have now reviewed the Amended Record on Appeal and note that the Appellant has not fully or correctly complied with this Court's Order in the following particulars:

1. The Amended Record on Appeal as served on the Respondents still does not include any sequential page numbering which violates Rule 210(c), SCACR, which provides: "Each page of the Record on Appeal shall be numbered consecutively beginning with the Index." Without sequential page numbering, the Respondents still are unable to prepare their Final Briefs because they are unable to provide specific cites to the Record on Appeal.
2. The Index does not show sequential page numbers either. The Plaintiff appears to have given each document in the Record a number from 1 to 12, and those are the "page numbers" listed in the Index. Those do not correlate to the remainder of the Amended Record on Appeal which contains no sequential page numbering at all.

V. Claire Allen, Esquire
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3. The Amended Record on Appeal still does not comply with the Supreme Court Order relating to the redaction of personal data identifiers and other sensitive information in documents filed with the South Carolina appellate courts. While it appears that the Appellant made an effort to comply, he has actually redacted much more than required by the Supreme Court Order. The Appellant has redacted numerous names of persons (not limited to minors) including parties and judges and even case names as contained in the Complaint and motion hearing transcript. Those redactions make large segments of those documents impossible to read or comprehend as a result.

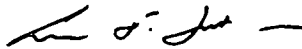
4. While the covers for the Amended Record on Appeal now include the names and addresses for Respondents' counsel, the Appellant has removed his name and address. There is no identification of the Appellant. He also did not include Andrew Lindemann as counsel for the Respondent Myers.

Please advise whether the Court will be accepting or rejecting this Amended Record on Appeal or whether any further action is required by the Respondents to obtain compliance by the Appellant with the Order filed June 5, 2014. Please also advise whether a deadline is set for the filing of Final Briefs although without sequential page numbering it remains impossible to insert record cites in those Finals Briefs.

Thank you for your assistance and further guidance with this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/

V. Claire Allen, Esquire
July 21, 2014
Page Three

cc: Mr. Raymond W. Carter
c/o Tonya Turner
192 Empire Drive
Nashville, Tennessee 37211

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

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

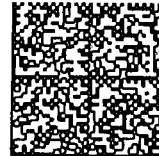
Mr. Timothy E. Stephenson
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Post Office Box 8568
Columbia, South Carolina 29202-8568

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