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THE STATE OF SOUTH CAROLINA
In The South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2014-000148
Civil Action No.: 2011-CP-07-04407

RECEIVED
DEC 22 2014
SC Court of Appeals

Alexander Pastene.....Appellant,

vs.

Thomas Trobaugh, Mr. & Mrs. Norman Ginsburg,
W. Richard Beetle, Country Club of Hilton Head,
ClubCorp. of Dallas, TX, CCHH Tennis Committee Members.....Respondents.

MOTION TO CORRECT DEFICIENCIES
CONTAINED WITHIN THE
APPELLANT'S RECORD ON APPEAL

I respectfully request the Court of Appeals inquire as to the following deficiencies contained within the Appellant's Record on Appeal:

1. The Appellant's Record on Appeal is not in compliance with the S.C. Appellate Court Rule 210, subsections designated below, in the following particulars:

(c) Content. The material contained in the Record on Appeal is not arranged in the designated order outlined in this subsection;

(d) Title. The title page does not comply with S. C. Appellate Court Rule 238; and

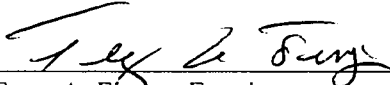
(g) Certificate of Counsel. Appellant's Record on Appeal does not certify that the Record on Appeal contains no material proposed to be included by any of the parties and not any other material.

2. Appellant's Record on Appeal does not contain Respondents' Designation of Matter Numbers 1, 2, 11 and 19.

3. Appellant's Exhibit #12, Respondents' Answer & Counterclaim of 2-02-12, Pages 67-69, is an incorrect pleading from Civil Case No. 9500700 filed in Magistrate's Court.

December 10, 2014

FINGER & FRASER, P.A.



Terry A. Finger, Esquire
P. O. Box 24005
Hilton Head Island, SC 29925-4005
(843) 681-7000
Attorney for Respondents Thomas Trobaugh,
Norman Ginsburg and Linda Ginsburg

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that I, Catherine Carstensen, Legal Assistant to Terry A. Finger, Esquire, Attorney for Respondents, Thomas Trobaugh, Norman Ginsburg, and Linda Ginsburg, have this day mailed a true and accurate copy of a Motion to Correct Deficiencies contained within the Appellant's Record on Appeal in the above-captioned matter to:

Mr. Alexander Pastene
P. O. Box 22298
Hilton Head Island, SC 29925

Mary B. Lohr, Esquire
Howell, Gibson & Hughes, P.A.
P. O. Box 40
Beaufort, SC 29901

via the U.S. Postal Service with first class postage prepaid.



Catherine Carstensen

Hilton Head Island, South Carolina
December 18, 2014

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FINGER & FRASER, P.A.
ATTORNEYS AT LAW

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Also admitted in:
* Georgia
† New York

□ Court Certified Mediator
▪ Court Certified Arbitrator / Mediator

December 18, 2014

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

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SC Court of Appeals

**Re: Thomas Trobaugh, Norman Ginsburg, et al.
adv. Alexander Pastene
Civil Action No.: 2011-CP-07-04407
Our File No.: 3851.001**

Dear Ms. Kitchings:

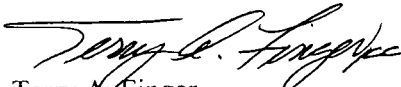
Enclosed please find originals and seven (7) copies of Respondents' Motion to Correct Deficiencies Contained Within the Appellant's Record on Appeal and Certificate of Service in the above captioned. Please file the originals and return time-stamped copies to me in the envelope provided for your convenience. Also enclosed please find a \$25.00 check representing the requisite filing fee.

By copy of this letter to Mr. Pastene and Mary B. Lohr, Esquire, I am informing them of this communication.

Thank you for your assistance in this regard.

Very truly yours,

FINGER & FRASER, P.A.


Terry A. Finger

TAF/cc

Enclosures

cc: Mr. Alexander Pastene
Mary B. Lohr, Esquire
Mr. Norman Ginsburg (via e-mail only)
Mr. Thomas Trobaugh (via e-mail only)