

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

Appellate Case No. 2014-001285

RECEIVED

DEC 15 2014

SC Court of Appeals

74490

National Security Fire and Casualty Company.....Plaintiff,

v.

Rosemary Jenrette, a/k/a Rosemary Long Jenrette,
and Horry County State Bank.....Defendants,

of whom

Rosemary Jenrette, a/k/a Rosemary Long Jenrette,Appellant,

v.

Horry County State Bank.....Respondent.

**MOTION TO AMEND
APPELLANT'S FINAL BRIEF**

Counsel for Appellant, Rosemary Jenrette a/k/a Rosemary Long Jenrette, hereby respectfully requests the Court, pursuant to Rule 240, SCACR, to amend the Final Brief of the Appellant to redact two typographical errors appearing in the last two sentences of the second to last paragraph on page 10 of said Final Brief to reflect the correct reference as to where the referenced materials appear in the Record on Appeal.



The Appellant would show that the second to last sentence of the second to last paragraph on page 10 of the Final Brief of the Appellant inadvertently referenced the material as appearing on the Transcript, page 246, line 25 – page 247, line 2. However, the referenced material appears in the Record on Appeal at page 246, line 25 – page 247, line 4. The Appellant would further show that the last sentence of the second to last paragraph on page 10 of the Final Brief of the Appellant inadvertently referenced the material as appearing in the Record on Appeal at page 12, line 14 – page 121, line 2. However, the referenced material appears in the Record on Appeal at page 120, line 14 – page 121, line 2. Therefore, Appellant respectfully requests that the last two sentences of the second to last paragraph on page 10 of the Final Brief of the Appellant be amended to reflect the correct reference as to where the referenced materials appear in the Record on Appeal as follows (R. p. 246, line 25-p.247, line 4) and (R. p. 120, line 14-p. 121, line 2).

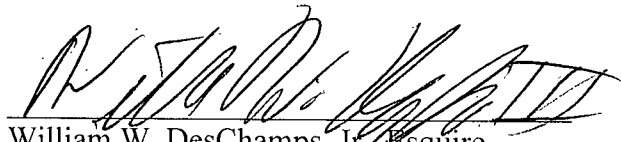
Appellant respectfully contends that good cause exists and the interest of justice will be served by granting Appellant's request for leave to amend the Final Brief of Appellant. Therefore, Appellant respectfully prays upon this Court to inquire into the matters set forth herein and issue an Order granting the within Motion.

[SIGNATURE APPEARS ON FOLLOWING PAGE]

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DESCHAMPS LAW FIRM

December 12, 2014



William W. DesChamps, Jr., Esquire
William W. DesChamps, III, Esquire
Attorney for Appellant, Rosemary Jenrette
a/k/a Rosemary Long Jenrette
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Other Counsel of Record:

Randall K. Mullins, Esquire
Mullins Law Firm, PA
Attorney for the Respondent
Post Office Box 585
N. Myrtle Beach, SC 29597

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Defendants,

Of whom

Rosemary Jenrette, AKA Rosemary Long Jenrette is the Appellant,

and

Horry County State Bank is the Respondent.

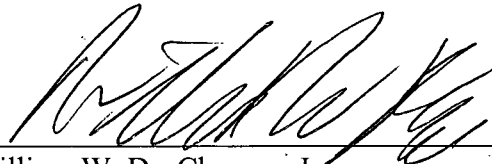
PROOF OF SERVICE

I certify that I have served one (1) copy of the Motion to Amend Appellant's Final Brief on counsel for Respondent Horry County State Bank depositing a copy of the same in the United States Mail, postage prepaid, on December 12, 2014, to the following address:

Randall K. Mullins, Esquire
Jarrod E. Ownbey, Esquire
Mullins Law Firm, PA
Attorney for the Respondent
Post Office Box 585
N. Myrtle Beach, SC 29597

Dated: December 12, 2014

DESCHAMPS LAW FIRM



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December 12, 2014

VIA UPS DELIVERY
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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court for the
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29211

Re: National Security Fire and Casualty Company v. Rosemary Jenrette a/k/a
Rosemary Long Jenrette and Horry County State Bank
Appellate Case No.: 2014-001285
Our File No.: L14-024
Our Client: Rosemary Jenrette, Appellant

Dear Ms. Kitchings:

Please find enclosed for filing:

- a. One (1) unbound original and seven (7) copies Motion to Amend Appellant's Final Brief with Proof of Service evidencing service of the Motion to Amend Appellant's Final Brief on Respondent's counsel attached to each, I am enclosing seven (7) copies so that you can return a clocked copy to our firm;
- b. One (1) unbound and fourteen (14) bound copies of the Amended Final Brief of the Appellant; and
- c. An original and one (1) copy of a proof of service evidencing service of the Amended Final Brief of Appellant on Respondent's counsel.

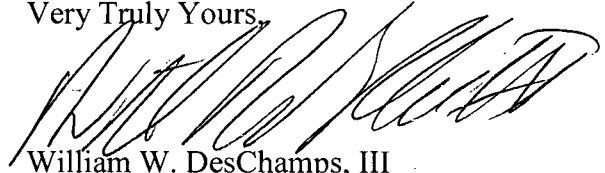
Please return clocked copies of the enclosed proofs of service to DesChamps Law Firm in the enclosed self-addressed pre-paid envelope at your earliest convenience.

By carbon copy of this letter, I have delivered a copy of this correspondence to Jarrod E. Ownbey as counsel for the Respondent, Horry County State Bank.

A handwritten signature in black ink, appearing to be 'J. DesChamps', is located in the bottom right corner of the page.

If you should have any questions or concerns, please do not hesitate to contact me.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "William W. DesChamps, III". The signature is fluid and cursive, with a large initial "W" and "D".

William W. DesChamps, III
Attorney for the Appellant

WWDIII/mjh

Enclosures

cc: Randall K. Mullins, Esquire
Jarrod E. Ownbey, Esquire
Rosemary Jenrette, Client