

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

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

RECEIVED

JAN 12 2015

SC Court of Appeals

74138

Alexander Pastene.....Appellant,

vs.

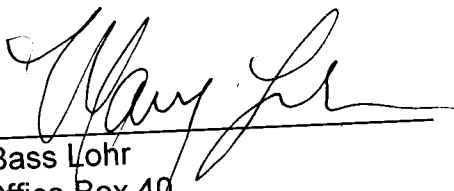
Thomas Trobaugh, Mr. and Mrs. Norman Ginsburg, W. Richard Beetle, Country Club of Hilton Head, Club Corp of Dallas, Texas, Members of the CCHH Tennis Committee.....Respondents.

REPLY TO APPELLANT'S MOTION TO SUPPLEMENT RECORD ON APPEAL
AND MOTION TO STAY TIME FOR FILING FINAL BRIEFS

The Respondents, W. Richard Beetle, Country Club of Hilton Head, Club Corp of Dallas, Texas, Members of the CCHH Tennis Committee, are in receipt of the Appellant's recent *Motion to Supplement the Appellant's Record on Appeal under Rule 212 SCACR, as Appendix to the Record on Appeal* dated December 28, 2014. The Respondents object to this motion as it is admittedly not part of the record of this case, irrelevant, and prejudicial.

Further, the Respondents would move the Court for an Order temporarily holding the time for filing the Respondent's Final Brief in abeyance, until such time as a final Record on Appeal is produced by the Appellant, Alexander Pastene.

HOWELL, GIBSON & HUGHES, P.A.

By: 
Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901
(843) 522-2400
Attorney for Respondents

Beaufort, South Carolina

January 9, 2015

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

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

RECEIVED

JAN 12 2015

SC Court of Appeals

Alexander Pastene.....Appellant,

vs.

Thomas Trobaugh, Mr. and Mrs. Norman Ginsburg, W. Richard Beetle, Country Club of Hilton Head, Club Corp of Dallas, Texas, Members of the CCHH Tennis Committee.....Respondents.

CERTIFICATE OF SERVICE

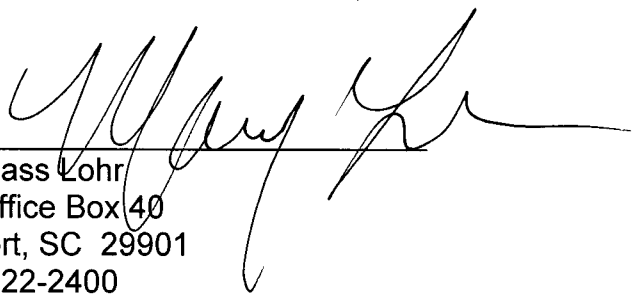
The undersigned counsel hereby certifies that she has served the foregoing Reply to Appellant's Motion to Supplement Record on Appeal and Motion to Stay Time for Filing Final Briefs upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on the 9th day of January, 2015 addressed to the following:

Mr. Alexander Pastene
Post Office Box 22298
Hilton Head Island, SC 29925

AND

Terry A. Finger, Esquire
Finger & Fraser P.A.
Post Office Box 24005
Hilton Head Island, SC 29925-4005

HOWELL, GIBSON & HUGHES, P.A.

By: 
Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901
(843) 522-2400
Attorney for Respondents

HOWELL, GIBSON AND HUGHES, P.A.
ATTORNEYS AT LAW

Post Office Box 40
Beaufort, South Carolina 29901-0040
www.hghpa.com

STEPHEN P. HUGHES
PATRICK M. HIGGINS *
ROBERT W. ACHURCH III *
DAVID S. BLACK
MARY BASS LOHR
THOMAS A. BENDLE, JR.

25 RUE DU BOIS
LADY'S ISLAND
BEAUFORT, SOUTH CAROLINA 29907

TELEPHONE: 843 - 522-2400
FAX NUMBER: 843 - 522-2429
E-Mail: hghpa@islc.net
WRITER'S DIRECT: 843 - 522-2428

J. ANDREW YOHO

JAMES S. GIBSON, JR *
Of Counsel

* Certified Mediator

January 9, 2015

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Alexander Pastene vs. Thomas Trobough, Mr. and Mrs. Norman
Ginsberg, W. Richard Beetle, Country Club of Hilton
Head, Club Corp of Dallas TX. CCHH Tennis Committee Members
Civil Action No.: 2014-000148
Our File No: 11017 MBL

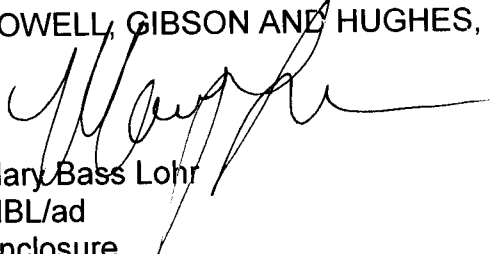
Dear Ms. Kitchings:

Please find enclosed herewith for filing an original and six (6) copies of the *Reply to Appellant's Motion to Supplement Record on Appeal and Motion to Stay Time for Filing Initial Briefs* along with a check in the amount of \$25.00 with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.


Mary Bass Lohr
MBL/ad

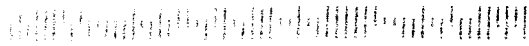
Enclosure

cc: Mr. Alexander Pastene
Terry A. Finger

RECEIVED

JAN 12 2015

SC Court of Appeals



HOWELL, GIBSON & HUGHES, P.A.
POST OFFICE BOX 40
BEAUFORT, SOUTH CAROLINA 29901
MBL

RECEIVED

JAN 12 2015

SC Court of Appeals

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211