

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

174766

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Case No. 2013-CP-40-7842

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Thomas Free,

Appellant,

v.

Natena Buff,

Respondent.

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**MOTION TO ADD ADDITIONAL COUNSEL**

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William H. Bowman, III  
Rogers Townsend & Thomas, PC  
Post Office Box 100200(29202)  
220 Executive Center Drive  
Columbia, SC 29210  
803-771-7900

Attorney for Respondent

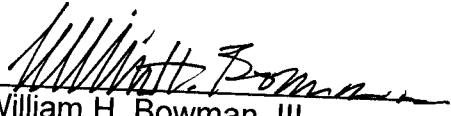
  
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**RECEIVED**  
JAN 14 2015  
**SC Court of Appeals**

Pursuant to Rule 240 of the Rules of Appellate Practice, the Respondent hereby moves the Court to add Robert P. Wood, Esquire, as Co-Counsel for the Respondent for the purpose of presenting oral arguments in the case.

Counsel for the Respondent has conferred with Counsel for the Appellant who has no objection to the granting of this motion.

Respectfully submitted,



William H. Bowman, III  
Rogers Townsend & Thomas, PC  
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220 Executive Center Drive  
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803-771-7900  
Attorney for Respondent

January 12, 2015

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In the Court of Appeals

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G. Thomas Cooper, Jr., Circuit Court Judge

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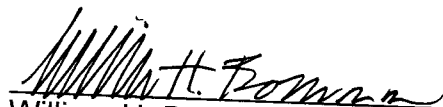
Respondent.

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**PROOF OF SERVICE**

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I certify that I have served Respondent's Motion to Add Additional Counsel in this case on Frank A. Barton and H. Wayne Floyd, attorneys for the Appellant, by depositing a copy of it in the United States Mail, postage prepaid, on January 12, 2015, addressed to H. Wayne Floyd at P.O. Box 3972, West Columbia, South Carolina 29170; and, Frank A. Barton at 1611 Augusta Road, West Columbia, South Carolina, 29169.



William H. Bowman, III  
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Attorney for Respondent

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JAN 14 2015

**SC Court of Appeals**

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LICENSED IN SOUTH CAROLINA



January 9, 2015

V. Claire Allen, Deputy Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: Thomas Free vs. Natena Buff**  
**Case No.: 2013-002138**  
**Docket No.: 12-CP-40-7842**  
**Claim No.: 0328492750101028**  
**Date of Loss: December 1, 2009**  
**RTT No.: 011222-01181**

Dear Ms. Allen:


Enclosed please find original and seven (7) copies of the Respondent's Motion to Add Additional Counsel with a Proof of Service. I would appreciate your filing the original and date stamping a copy for our files.

By copy of this letter, I am enclosing a copy of same to opposing counsel, Frank B. Barton and H. Wayne Floyd.

If you have any questions, please let me know. Thank you.

Sincerely,

ROGERS TOWNSEND & THOMAS, P.C.

  
William H. Bowman, III

WHB/rat

cc: Frank B. Barton, Esquire  
H. Wayne Floyd, Esquire

**RECEIVED**

JAN 14 2015

**SC Court of Appeals**



V. Claire Allen, Deputy Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211



ROGERS TOWNSEND  
ATTORNEYS AT LAW

RECEIVED

JAN 14 2015

U.S. DEPARTMENT OF JUSTICE