

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
DeAndrea Gist Benjamin, Circuit Court Judge

Case No. 2013-CP-40-1643

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JAN 30 2015

SC Court of Appeals

74909

Samuel T. Brick,

Appellant,

v.

Richland County Planning Commission and
Fairways Development, LLC, Intervenor,

Respondents.


MOTION TO CORRECT RECORD ON APPEAL

The Respondent, Richland County Planning Commission, respectfully moves this Court for an Order, pursuant to Rule 240, SCACR, requiring the Appellant to file a corrected Record on Appeal that includes all documents designated by the Respondents for inclusion in the Record on Appeal and that also corrects other deficiencies with the Amended Record on Appeal as filed.

The Respondent Richland County Planning Commission's motion is addressed in greater detail in the supporting memorandum filed herewith.

The Respondent Richland County Planning Commission requests that the Court hold all deadlines in abeyance until this issue regarding the Record on Appeal is resolved.

DAVIDSON & LINDEMANN, P.A.

BY: 

ANDREW F. LINDEMANN
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*Counsel for Respondent
Richland County Planning Commission*

Columbia, South Carolina

January 27, 2015

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DeAndrea Gist Benjamin, Circuit Court Judge

Case No. 2013-CP-40-1643

Samuel T. Brick, Appellant,

v.

Richland County Planning Commission and
Fairways Development, LLC, Intervenor, Respondents.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondent Richland County Planning Commission, does hereby certify that service of the **Motion to Correct Record on Appeal** and **Memorandum in Support of Motion to Correct Record on Appeal** was made upon the *pro se* Appellant and all other counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 27th day of January 2015:

Mr. Samuel T. Brick
124 Runneymede Drive
Blythewood, South Carolina 29016

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SC Court of Appeals

Tobias G. Ward, Jr., Esquire
J. Derrick Jackson, Esquire
Tobias G. Ward, Jr., P.A.
Post Office Box 6138
Columbia, South Carolina 29260



DAVIDSON & LINDEMANN, P.A.

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†Certified Mediator

January 27, 2015

Of Counsel
Kenneth P. Woodington

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

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Samuel T. Brick v. Richland County Planning Commission and
Fairways Development, LLC
Appellate Case Number: 2014-000583
Civil Action Number: 2013-CP-40-1643
Our File Number: 314.9169

Dear Ms. Kitchings:

Please find enclosed for filing the originals and seven copies each of the **Motion to Correct Record on Appeal** and **Memorandum in Support of Motion to Correct Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on the *pro se* Appellant and all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

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The Honorable Jenny Abbott Kitchings
January 27, 2015
Page Two

cc: (w/ Enclosures)

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