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January 27, 2015

RECEIVED

JAN 27 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

RE: Richard W. Wilson v. Laura B. Willis, and Jesse A. Dantice, et al.
Civil Action No. 2012-CP-01-306
Appellate Case No. 2014-000946
Our File No. 00350/01679

Dear Ms. Kitchings:

Enclosed please find the original and sixteen copies each of the following documents to be filed:

1. Final Amended Reply Brief of Appellants;
2. Final Brief of Appellants;
3. Record on Appeal.

Appellants served Respondents' counsel with a supplemental volume of the Record on Appeal on January 23, 2015, to include certain items that were inadvertently omitted from the previously served Record on Appeal, which had not yet been filed at that time. Counsel for the parties to this appeal consented to this supplemental volume.¹ (See attached.)

¹ Elizabeth Carter of the Court of Appeals' Clerks Office confirmed to Appellants' counsel that in such a situation, no motion was required to supplement the Record so long as all parties to the appeal consented to the supplementation.

The Honorable Jenny Abbott Kitchings
January 27, 2015
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We would ask that you file the originals and return the clocked-in copies to us via our courier.

Very truly yours,

A handwritten signature in black ink, appearing to read "Miles E. Coleman", with a long horizontal flourish extending to the right.

Miles E. Coleman

MEC:lpw
Enclosure

cc: Thomas E. Hite, Jr., Esquire
Jane H. Merrill, Esquire
William H. Nicholson III, Esquire (letter only)
Mason A. Goldsmith, Esquire (letter only)
Elizabeth M. McMillan, Esquire (letter only)
Jeffrey C. Kull, Esquire (letter only)
D. Larry Kristinik, Esquire (letter only)
James C. (Trey) Cox III, Esquire (letter only)
Jeffrey A. Lehrer, Esquire (letter only)

Miles Coleman

From: Anne Marie Hempy <ahempy@hiteandstone.com>
Sent: Friday, January 23, 2015 11:10 AM
To: Jane H. Merrill
Cc: Miles Coleman
Subject: Re: Williams v. Willis, Court of Appeals

Thanks to you all!

Sent from my iPhone

Please excuse any spelling or formatting errors.

On Jan 23, 2015, at 11:07 AM, Jane H. Merrill <jane@hmlawsc.com> wrote:

Miles,

I think creating a Volume III and just adding those documents to the end would be better for everyone. Thank you for correcting the error. If you have additional questions today I will be available on my cell, 864-554-5847 for about the next hour and a half and then I'll be in mediation during the afternoon.

Thanks,
Jane

<PastedGraphic-1.tiff>

On Jan 23, 2015, at 10:42 AM, Miles Coleman
<Miles.Coleman@nelsonmullins.com> wrote:

Jane:

We are currently compiling the materials that we inadvertently omitted from the record. I just received a phone call from Anne Hempy from Hite & Stone. She is currently in the car on the way to Columbia with the other Respondents' final briefs ready to file. She requested that we place the material listed in your email below at the end of the record so as to avoid changing all the page numbers (which would require her to redo her final briefs). For her convenience, do you consent to us placing the omitted material at the end of the record in a "Volume III"?

We plan to have the amended/completed record ready to email to you later today, and we will serve a hard copy of it as soon as we can have it printed and mailed. I apologize for the inconvenience caused by my prior oversight.

Miles

From: Jane H. Merrill [<mailto:jane@hmlawsc.com>]
Sent: Thursday, January 22, 2015 11:00 PM

To: Bob Calamari; Mitch Brown; ahempy@hiteandstone.com; tommyhite@hotmail.com
Subject: Williams v. Willis, Court of Appeals

Dear Counsel:

Upon reviewing the Record on Appeal, there are several items missing which were included on the Designation of Matter filed on behalf of my client, Laurie Williams. The following items are missing from the Record on Appeal:

Summons, and Answer and Cross Claim filed May 28, 2013, Gary v. Willis (2013-CP-01-66)

Summons and Complaint filed May 29, 2013, Williams v. Gary (2013-CP-01-165)

Answer filed on or about June 28, 2013, Gary v. Willis (2013-CP-01-66)

Order filed July 22, 2014, Williams v. Gary (2013-CP-01-165)

Motion to Remand filed by Gary, December 19, 2012, First National Ins. Co. v. Gary and Williams (8:12-CV-3124-GRA)

Motion to Remand filed by Williams, December 19, 2012, First National Ins. Co. v. Gary and Williams (8:12-CV-3124-GRA)

Will you consent to my request for an extension to file my final brief so that the record on appeal may be corrected first?

Thank you.

Jane H. Merrill

Hawthorne Merrill Law, LLC
jane@hmlawsc.com | 864-229-1010
410 Main St. | Greenwood, SC 29646

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