

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

75174

APPEAL FROM ABBEVILLE COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED

FEB 25 2015

SC Court of Appeals

Case No. 2012-CP-01-0227

Bay Island Sportswear, Inc and
Sam Simchon, Individually..... Plaintiffs/Appellants,

v.

Vince Coates, Individually, XCentric Ventures, LLC,
Edward Magedson and John or Jane Doe 1-7 and
XYZ Company X-Z..... Defendants,

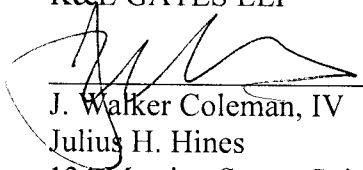
Of Whom Vince Coates isRespondent.

MOTION TO CONSOLIDATE

Appellants Bay Island Sportswear, Inc. and Sam Simchon hereby move, pursuant to Rule 214, SCACR, to consolidate the within appeal with the pending appeal in Vince Coates v. Dorothy Renee Simchon, Appellate Case No. 2014-002729. The Appellants hereby adopt and incorporate by reference the arguments set forth in the Motion of Consolidate of Dorothy Renee Simchon in the aforementioned appellate matter.

February 23, 2015

K&L GATES LLP



J. Walker Coleman, IV
Julius H. Hines
134 Meeting Street, Suite 200
Charleston, SC 29401
(843) 579-5600
(843) 579-5600

Edward S. McCallum, III
Law Offices of Edward S. McCallum, III
Post Office Box 148
Greenwood, SC 29648
(864) 223-8546

ATTORNEYS FOR APPELLANTS

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ABBEVILLE COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED

FEB 25 2015

SC Court of Appeals

Case No. 2012-CP-01-0227

Bay Island Sportswear, Inc. and
Sam Simchon, Individually Plaintiffs/Appellants,

v.

Vince Coates, Individually, XCentric Ventures, LLC,
Edward Magedson and John or Jane Doe 1-7 and
XYZ Company X-Z Defendants,

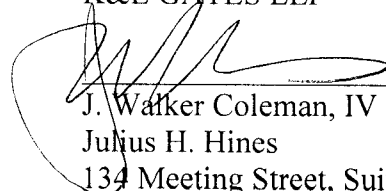
Of Whom Vince Coates is Respondent.

PROOF OF SERVICE

I certify that I have served the Motion to Consolidate on Vince Coates, by depositing a copy of it in the United States Mail, postage prepaid, on February 23, 2015, addressed to his attorneys of record, C. Rauch Wise, 305 Main Street, Greenwood, SC 29646 and Stephen John Henry, 406 Pettigru Street, Greenville, South Carolina 29601.

February 23, 2015

K&L GATES LLP



J. Walker Coleman, IV
Julius H. Hines
134 Meeting Street, Suite 200
Charleston, SC 29401

walker.coleman@klgates.com
julius.hines@klgates.com
Telephone: (843) 579-5600
Facsimile: (843) 579-5600

Edward S. McCallum, III
Law Offices of Edward S. McCallum, III
Post Office Box 148
Greenwood, SC 29648
Telephone: (864) 223-8546

ATTORNEYS FOR APPELLANTS
BAY ISLAND SPORTSWEAR, INC.
and SAM SIMCHON

February 23, 2015

Julius H. Hines
julius.hines@klgates.com
T 843.579-5660
F 843.579.5601

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

Re: Bay Island Sportswear, Inc. and Sam Simchon, Individually v.
Vince Coates, Individually, *et al.*
Abbeville County Case No. 2012-CP-01-0227

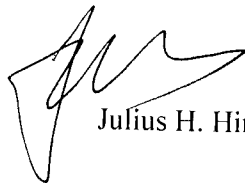
Dear Ms. Kitchings:

Enclosed please find the following documents in connection with the above-referenced case:

1. Original and six copies of Motion to Consolidate;
2. Original and six copies of Proof of Service of Motion to Consolidate;
3. Check in the amount of \$25.00 for the filing fee; and
4. Self-addressed stamped envelope for returning filed copies.

Thank you for your assistance in this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Julius H. Hines

JHH/glm
Enclosures

cc: Stephen John Henry, Esq. (w/enc.)
C. Rauch Wise, Esq. (w/enc.)
Edward S. McCallam, III, Esq. (w/enc.)
J. Walker Coleman, IV, Esq. (w/enc.)

RECEIVED

FEB 25 2015

SC Court of Appeals

UNITED STATES POSTAL SERVICE



PITNEY BOWERS
02 1P
\$ 002.00
0003191569 FEB 23 2015
MAILED FROM ZIP CODE 29201

First Class Mail



K&L GATES LLP
134 MEETING STREET
SUITE 200
CHARLESTON, SC 29401

SC Court of Appeals

FEB 25 2015

RECEIVED

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

