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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM SUMTER COUNTY  
In the Court of Common Pleas

R. Ferrell Cothran, Jr., Presiding Judge

RECEIVED

APR 13 2015

SC Court of Appeals

Appellate Case No. 2014-001903

Milton Oakley Dickson,.....Appellant,

v.

Arthur B. Beasley, Jr.,.....Respondent,

IN Re: Estate of Herbert Franklin Dickson, Sr.

**MOTION TO AMEND RECORD ON APPEAL FILED WITH COURT**

The undersigned, as counsel for the Appellant hereby moves for leave of the Court to amend the Record on Appeal filed with the Court on March 23, 2015, by removing the Last Will and Testament of Melba McSween Dickson (existing pages ROA000121 – 000129) and replacing this with the Last Will and Testament of Herbert Franklin Dickson, Sr. (new pages ROA000121 – 000129).

The Last Will and Testament of Mrs. Dickson was inadvertently put into the Record on Appeal instead of Mr. Dickson's Last Will and Testament. This motion is made on the grounds that leave of the Court to physically replace these pages in the existing filed Record on Appeal will prevent the Appellant from supplementing the

Record on Appeal, and will also prevent the Appellant and/or Respondent from having to re-file Final Briefs. Respondent Attorney Kenneth Young, Jr., by and through his paralegal, has consented to the replacement of Mrs. Dickson's Will with Mr. Dickson's Will. A copy of the email correspondence to this effect is attached as Exhibit A.

WHEREFORE, Appellant respectfully prays that this Court grant Appellant's counsel leave of the Court to replace the above-referenced pages in the filed Record on Appeal.



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S. Jahue Moore, SC Bar #4063  
John C. Bradley, Jr., SC Bar #7869  
MOORE TAYLOR LAW FIRM, PA  
1700 Sunset Boulevard  
West Columbia, SC 29169  
803-796-9160  
Attorneys for Appellant

West Columbia, South Carolina

April 13, 2015

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IN THE COURT OF APPEALS

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APPEAL FROM SUMTER COUNTY  
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R. Ferrell Cothran, Jr., Presiding Judge

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Milton Oakley Dickson,.....Appellant,

v.

Arthur B. Beasley, Jr.,.....Respondent,

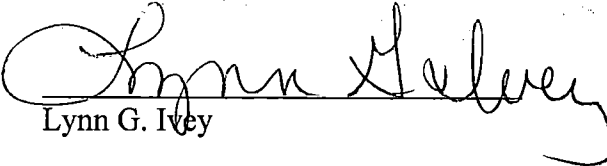
IN Re: Estate of Herbert Franklin Dickson, Sr.

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PROOF OF SERVICE

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I certify that I have served the Motion to Amend Record on Appeal Filed with Court on Kenneth R. Young, Jr., Esquire by depositing a copy of it in the United States Mail, postage prepaid, on April 13, 2015, addressed to Kenneth R. Young, Jr., 23 West Calhoun Street, Sumter, SC, 29150.

  
Lynn G. Ivey

West Columbia, South Carolina  
April 13, 2015

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SC Court of Appeals

April 13, 2015

The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
P.O. Box 11629  
Columbia, SC 2921  
VIA HAND DELIVERY

RE: Milton Oakley Dickson v. Arthur B. Beasley, Jr.  
Appellate Case No. 2004-001903

Dear Ms. Kitchings:

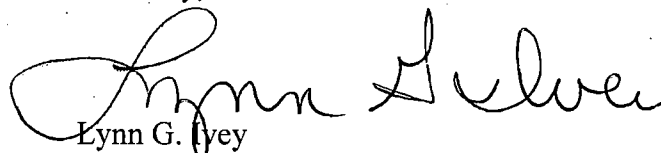
Please find attached to this letter the original and two copies of Appellant's Motion to Amend Record on Appeal Filed with Court. Please return the clocked copies via our courier.

As we previously notified and discussed with your office, it came to our attention that the Record on Appeal contains an incorrect document. Specifically, the Last Will and Testament of Melba McSween Dickson was included on pages ROA000121 - 129. The Last Will and Testament of Herbert Franklin Dickson, Sr. should have been included instead of his wife's.

By copy of this letter, we are serving Respondent's counsel with a copy of this Motion.

Thank you for your assistance with this matter.

Sincerely,



Lynn G. Fey  
Assistant to John C. Bradley, Jr.

Enclosures

cc: Kenneth R. Young, Jr. Esquire

**RECEIVED**

APR 13 2015

SC Court of Appeals

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