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IN THE STATE OF SOUTH CAROLINA

APR 24 2015

In the Court of Appeals

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2015-000002

The Callawassie Island Members Club, Inc.,Respondent,

v.

Michael J. Frey and Grace I. FreyDefendants,

Of Whom Michael J Frey is the Appellant.

**CONSENT MOTION OF APPELLANT
FOR LEAVE TO AMEND INITIAL BRIEF OF APPELLANT**

Appellant respectfully requests the Court's leave to amend Appellant's initial brief, to add more specificity to the citations to the Record on Appeal, as requested by Respondent. The amended brief was submitted to the Court on April 21. The changes are non-substantive, only to add specific citations requested by Respondent Counsel for Respondent has consented to this Motion.

Appellant filed and served its initial brief on April 1, 2015. On April 10, 2015, counsel for Respondent requested that additional specificity be provided for citations to the Record on Appeal. Two business days later (on April 14), Respondent provided the requested citations, in the form of an amended brief, to Respondent, by e-mail.¹ After receiving no indication of further concern, on April 21, 2015, Respondent sent formal copies of the brief to the Court of Appeals, with copies mailed and e-mailed to Respondent. The changes to the initial brief are solely the addition of certain citations to the Record on Appeal; there is no substantive change.

Appellant requests the Court's leave to file the amended initial brief on April 21, 2015, for the purpose of providing additional specificity in the citations to the Record on Appeal. Appellant has no objection, and consents, to a 30-day extension to Respondent's time to respond to its initial brief.

¹ This request involves three similar appeals in which the Callawassie Island Members Club is the Respondent: 2015-000001 (*Martin*), 2015-000002 (*Frey*), 2015-000003 (*Quinn*). The citations in the three initial briefs are almost all the same. The citations provided on April 14 were to the initial brief in appeal 2015-000003 (*Quinn*). Upon receiving no objection or concern from Respondent about the *Quinn* updated citations, Appellant updated the other two briefs (*Martin* and *Frey*) and on April 21 formally served them upon Respondent and submitted them to this Court.

Respectfully submitted,



Ian S. Ford

Bar no. 12463

Neil D. Thomson

Bar no. 71209

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715 King Street

Charleston, South Carolina 29403

843-277-2011

Attorneys for Appellant

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS
BEAUFORT COUNTY
FOURTEENTH JUDICIAL CIRCUIT

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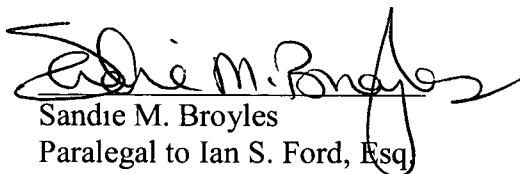
Appellant.

PROOF OF SERVICE

I certify that I have served the Consent Motion of Appellant for Leave to Amend Initial Brief of Appellant, on all parties of record, by depositing a copy of it in the United States Mail, postage prepaid, on April 23, 2015, addressed to the attorney of record, Ehrick K. Haight, Jr., Esq., Minor, Haight & Arundell, P.C., P.O. Drawer 6067, Hilton Head, SC 29938 and Stephen Hughes, Esq. & Andrew Yoho, Esq., P.O. Box 40, Beaufort, SC 29901.

April 23, 2015

FORD WALLACE THOMSON LLC



Sandie M. Broyles
Paralegal to Ian S. Ford, Esq.
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Charleston, SC 29403
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FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

April 23, 2015

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SC Court of Appeals

Jenny Abbot Kitchings, Clerk
SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re. *The Callawassie Island Members Club Inc vs. Mary K. Quinn*
Beaufort County Case No.: 2012-CP-07-03216
SC Court of Appeals Case No.: 2015-000003

The Callawassie Island Members Club Inc. vs. Michael J Frey
Beaufort County Case No.: 2012-CP-07-03209
SC Court of Appeals Case No.: 2015-000002

The Callawassie Island Members Club Inc. vs. Gregory L. Martin
Beaufort County Case No.: 2012-CP-07-03218
SC Court of Appeals Case No.: 2015-000001

Dear Jenny:

Enclosed for filing please find the Consent Motion of Appellant for Leave to Amend Initial Brief of Appellant for the above-referenced matters.

By copy of this letter, I am serving all counsel of record with the same.

Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact my office.

With kind regards, I am,

Very truly yours,



Ian S. Ford

ISF/smb
Enc. - as stated

cc: Ehrick K. Haight, Jr., Esq.
Stephen Hughes, Esq.