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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 15 2015

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

SC Court of Appeals

Edgar W. Dickson, Circuit Court Judge

Case Number 2011-CP-38-01379

APPELLATE CASE NO.: 2014-000168

William Breland,Respondent

v.

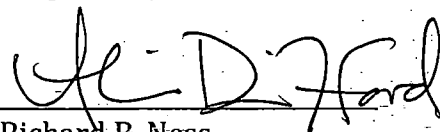
South Carolina Department of Transportation,Appellant,

MOTION FOR SUPPLEMENTING RECORD ON APPEAL

Pursuant to Rule 212, SCACR, the appellant moves the Court for an Order permitting the supplementation of the Record on Appeal. When compiling the Final Record on Appeal, the appellant inadvertently omitted a brief, submitted to the lower court along with a Motion for Judgment Notwithstanding the Verdict. Appellant, with the consent of counsel for the Respondent, requests permission to file the accompanying Supplemental Record on Appeal for consideration by the

Court. The grounds for this motion are the brief was initially designated by counsel to be included in the record and omitted in error, and the attorneys for both parties desire its inclusion, and consent to the submission of the Supplemental Record on Appeal. This is the first Supplementation, and the parties do not anticipate any further Supplementation.

Respectfully Submitted,



Richard B. Ness
Norma A. T. Jett
Alison Dennis Hood
Adam C. Ness
Ness & Jett, LLC
P.O. Box 909
Bamberg, SC 29003
Phone: (803) 245-5178
Fax: (803) 245-5384
Attorneys for Appellant

July 15, 2015
Bamberg, SC

IN THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM ORANGEBURG COUNTY

Honorable Edgar Warren Dickson, Chief Administrative Judge, Presiding

CASE NO.: 2011-CP-38-1379

APPELLATE CASE NO.: 2014-000168

William Breland, Respondent,

-vs-

South Carolina Department of Transportation, Appellant.

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SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Motion to Supplement Record on Appeal and Bound Supplemental Record on Appeal on counsel of record, on July 15th, 2015 as follows:

John S. Nichols, Esquire
Blake A. Hewitt, Esquire
P. O. Box 7965
Columbia, SC 29202
(by depositing a copy of it in the United States Mail, postage prepaid)

J. Christopher Wilson, Esquire
Daniel W. Luginbill, Esquire
(via hand delivery)

July 15, 2015

Bamberg, SC

NESS & JETT, LLC
BY: Alison Dennis Hood
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*CERTIFIED CIRCUIT COURT MEDIATOR

ALISON DENNIS HOOD
ADAM C. NESS

JULIUS B. NESS
1916-1991

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk
S. C. Court of Appeals
P. O. Box 11629
Columbia, SC 29211

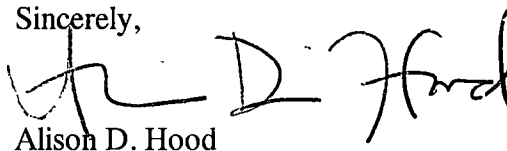
Re: William Breland v. SCDOT
Case No.: 2011-CP-38-01379
Appellate Case No.: 2014-000168

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Appellant's Motion regarding original exhibits and the original and seven copies of Appellant's Motion for supplementing the record on appeal, as well as two checks for \$25.00 each for the filing fee. In addition to the Motion for supplementing the record on appeal, Appellant herein files the original and fourteen bound copies of the supplemental record on appeal, as well as a Certificate of Service. Please file the original Motions, along with the supplemental record on appeal and return a clocked copy to me.

Also, by copy of this letter, I am serving Appellant's Motion regarding original exhibits, Appellant's Motion for supplementing the record on appeal, and a bound copy of the supplemental record on appeal, as well as a Certificate of Service, on Attorneys, J. Christopher Wilson, Daniel W. Luginbill, Blake Alexander Hewitt, and John S. Nichols.

Sincerely,



Alison D. Hood

ADH/dlh
Enclosures

CC: J. Christopher Wilson, Esq.
Daniel W. Luginbill, Esq.
John S. Nichols, Esq.
Blake Alexander Hewitt, Esq.