

77229

RECEIVED

SEP 11 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2012-CP-06-00326

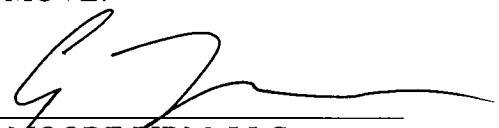
Henry Lee Carroll, II .....Appellant,  
v.  
Alex Webb Causey and Stacey Jenkins,.....Respondents.

MOTION TO AMEND CAPTION AND FOR AN EXTENSION OF TIME TO FILE A CORRECTED CERTIFICATE OF COUNSEL AND PROOFS OF SERVICE TO REFLECT THE CORRECTED CAPTION, PARTIES, AND ATTORNEYS OF RECORD AND TO CORRECT THE CAPTIONS ON THE ORIGINAL AND ALL COPIES OF THE RECORD ON APPEAL AND FINAL BRIEFS

IT APPEARS Alex Webb Causey, who was represented in the trial court by Attorneys Anthony Livoti, J. Martin Harvey and Julian Allen (subsequently replaced by Attorney Brittany Boykin) is not a party to this appeal and should not be listed as a Respondent. Therefore, Appellant moves for permission to amend the caption to read as shown on the attached page.

Appellant further moves for an extension of time to file and serve a corrected Certificate of Counsel and corrected Proofs of Service reflecting the corrected caption and to correct the caption on the original and all copies of the record on appeal and final briefs.

I SO MOVE:

  
\_\_\_\_\_  
THE MOORE FIRM, LLC  
E. T. Moore, Jr.  
Post Office Box 160  
Barnwell, South Carolina 29812  
803-259-2021

September 10, 2015

RECEIVED

SEP 11 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2012-CP-06-00326

Henry Lee Carroll, II .....Appellant,

v.

Alex Webb Causey and Stacey Jenkins,.....Defendants.

Of Whom Stacey Jenkins is the Respondent.

CERTIFICATE OF SERVICE BY MAIL

I, the undersigned employee of E. T. Moore, Jr., attorney for the Plaintiff in the foregoing action, (Henry Lee Carroll, II vs. Alex Webb Causey and Stacey Jenkins, Case No.: 2012-CP-06-326), certify I served copies of the MOTION TO AMEND CAPTION AND FOR AN EXTENSION OF TIME TO FILE A CORRECTED CERTIFICATE OF COUNSEL AND PROOFS OF SERVICE TO REFLECT THE CORRECTED CAPTION, PARTIES, AND ATTORNEYS OF RECORD AND TO CORRECT THE CAPTIONS ON THE ORIGINAL AND ALL COPIES OF THE RECORD ON APPEAL AND FINAL BRIEFS with SC Court of Appeals by depositing a copy of it in the United States mail, postage prepaid on September 10, 2015 addressed to the following attorneys of record:

Anthony W. Livoti, Esquire  
Murphy & Grantland, P.A.  
Post Office Box 6648  
Columbia, South Carolina 29260

J. Martin Harvey, Esquire  
Harvey & Kulmala, LLC  
Post Office Box 705  
Barnwell, South Carolina 29812

Michael T. Coulter, Esquire  
Clarkson, Walsh, Terrell & Coulter, P.A.  
Post Office Box 6728  
Greenville, South Carolina 29606

Brittany Boykin, Esquire  
Turner, Padgett, Graham & Laney, P.A.  
Post Office Box 22129  
Charleston, South Carolina 29413

Robert W. Achurch, III, Esquire  
Post Office Box 40  
Beaufort, South Carolina 29901

Andrew Yoho, Esquire  
Post Office Box 40  
Beaufort, South Carolina 29901

Clarissa Warren Joyner, Esquire  
Post Office Box 1724  
Orangeburg, South Carolina 29115

*Sylvia K. Quattlebaum*

Sylvia K. Quattlebaum  
THE MOORE FIRM, LLC  
319 Washington Street  
Post Office Box 160  
Barnwell, South Carolina 29812  
(803) 259-2021

Barnwell, South Carolina

September 10, 2015

RECEIVED

SEP 11 2015

SC Court of Appeals

**THE MOORE FIRM, LLC**

**E. TIMOTHY MOORE, JR.**  
*ATTORNEY AT LAW*

319 Washington Street  
Post Office Box 160  
Barnwell, South Carolina 29812

803-259-2021  
803-259-0208 (F)  
[morlaw@aol.com](mailto:morlaw@aol.com)

September 10, 2015

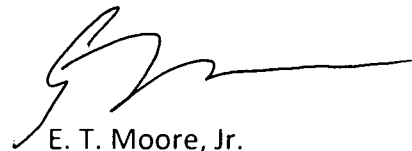
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: Henry Lee Carroll, II v. Alex Webb Causey and Stacy Jenkins  
Appellate Case No.: 2014-002585  
Civil Action No: 2012-CP-06-00326

Dear Ms. Kitchings,

Please find enclosed for filing the original and fifteen (15) copies of a MOTION TO AMEND CAPTION AND FOR AN EXTENSION OF TIME TO FILE A CORRECTED CERTIFICATE OF COUNSEL AND PROOFS OF SERVICE TO REFLECT THE CORRECTED CAPTION, PARTIES, AND ATTORNEYS OF RECORD AND TO CORRECT THE CAPTIONS ON THE ORIGINAL AND ALL COPIES OF THE RECORD ON APPEAL AND FINAL BRIEFS in the above referenced matter.

Sincerely,



E. T. Moore, Jr.

ETM/skq

Enc

Cc: Anthony W. Livoti, Esquire; J. Martin Harvey, Esquire; Michael T. Coulter, Esquire; Brittany Boykin, Esquire; Robert W. Achurch, III, Esquire; Andrew Yoho, Esquire; and Clarissa Warren Joyner, Esquire