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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Mikell R. Scarborough, Master in Equity

Appellate Case No. 2015-000034

RECEIVED

SEP 21 2015

SC Court of Appeals

THE WASHINGTON LIGHT INFANTRY OF CHARLESTON SOUTH CAROLINA, INC., Respondent

v.

THE SEA GRANT CONSORTIUM, an Agency and Political Subdivision of the State of South Carolina.....Appellant.

APPELLANT'S CONSENT MOTION TO SUPPLEMENT RECORD ON APPEAL

Appellant, The Sea Grant Consortium, an Agency and Political Subdivision of the State of South Carolina, through its undersigned counsel, respectfully seeks an Order allowing Appellant to supplement the Record on Appeal in this case with Appellant/Defendant's "Memorandum of Defendant."

This is an appeal from a declaratory judgment action filed by Respondent and heard by the Master-in-Equity. In the proceedings below, Appellant's prior counsel submitted a memorandum in opposition to Respondent's declaratory judgment action. However, neither party included the Memorandum in the original designations of matter in this case. Because the Memorandum of Defendant was received and considered by the Master, it was part of the record below, is relevant to this appeal and, therefore, should be part of the Record on Appeal.

Counsel for Respondent has graciously consented to this motion.

Wherefore, Appellant prays that the Court **GRANT** its motion to supplement the record with the "Memorandum of Defendant" and allow it to include this document in the Record on Appeal.

Pursuant to this Court's Order, the time for serving the Record on Appeal and filing proof of service with this Court is September 28, 2015. Appellant does not seek an extension of this deadline.



R. Bruce Wallace
Mary D. Shahid
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
PHONE: 843.720.1760
FACSIMILE: 843.414.8222
BWallace@nexsenpruet.com
MShahid@nexsenpruet.com

Attorneys for Appellant
THE SEA GRANT CONSORTIUM, an Agency and
Political Subdivision of the State of South Carolina

September 18, 2015
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Mikell R. Scarborough, Master in Equity

Appellate Case No. 2015-000034

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SEP 21 2015

SC Court of Appeals

THE WASHINGTON LIGHT INFANTRY OF
CHARLESTON SOUTH CAROLINA, INC., Respondent,

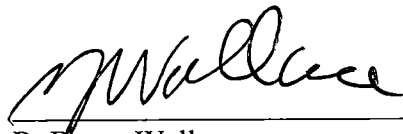
v.

THE SEA GRANT CONSORTIUM, an Agency
and Political Subdivision of the State of South Carolina.....Appellant.

**PROOF OF SERVICE FOR APPELLANT'S CONSENT MOTION TO SUPPLEMENT
RECORD ON APPEAL**

I, R. Bruce Wallace, hereby certify that I have served a copy of the APPELLANT'S
CONSENT MOTION TO SUPPLEMENT RECORD ON APPEAL upon counsel for
Respondent by mailing a copy to them at the address below via the United States Mail this 18th
day of September, 2015.

M. Richardson Hyman, Jr., Esquire
P.O. Box 127
Charleston, SC 29402



R. Bruce Wallace
Mary D. Shahid
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
PHONE: 843.720.1760
FACSIMILE: 843.414.8222
BWallace@nexsenpruet.com
mshahid@nexsenpruet.com

Attorneys for Appellant

NEXSEN | PRUET

R. Bruce Wallace
Member
Admitted in SC

September 18, 2015

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SEP 21 2015
SC Court of Appeals

VIA UPS

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *The Washington Light Infantry of Charleston South Carolina, Inc. v. The Sea Grant Consortium, an Agency and Political Subdivision of the State of South Carolina*
Appellate Case No: 2015-000034

Dear Ms. Kitchings:

Charleston

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

Myrtle Beach

Raleigh

Enclosed please find the original and seven copies of Appellant's Consent Motion to Supplement Record on Appeal. I also enclose a Proof of Service indicating service of the Motion above. Finally, I enclose our firm's check in the amount of \$25.00 for same.

I would greatly appreciate you filing the Motion with the Court of Appeals and returning a filed stamped copy to me in the enclosed self-addressed stamped envelope.

By copy of this letter, I am serving all counsel of record, via U.S. mail, with a copy of same.

Very truly yours,



R. Bruce Wallace

RBW/ksh

Enclosure(s)

cc: M. Richardson Hyman, Jr., Esquire

205 King Street
Suite 400 (29401)
PO Box 486
Charleston, SC 29402
www.nexsenpruet.com

T 843.720.1760
F 843.414.8222
E BWallace@nexsenpruet.com
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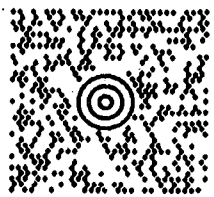
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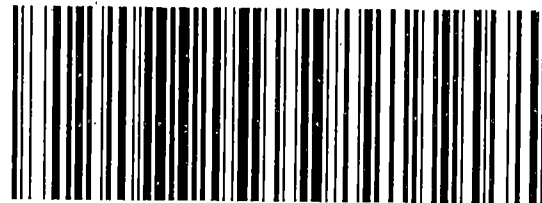
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SC Court of Appeals

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