

79702

**IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge  
Tanya A. Gee, Circuit Court Judge

**RECEIVED**  
MAY 27 2016  
SC Court of Appeals

Civil Action No.: 2013-CP-40-05675  
Appellate Case No.: 2015-001627

Willie J. Riley .....Appellant,

vs.

Dennis Wayne Catoe.....Respondent.

**MOTON TO SUPPLEMENT THE RECORD ON APPEAL**

Respondent Dennis Wayne Catoe hereby moves for an Order permitting him to supplement the Record on Appeal in the above-referenced case and staying the deadline for filing of Final Briefs until twenty (20) days after the supplemental Record on Appeal is served.

Respondent moves for this relief upon the following grounds:

Respondent's Designation of Matter to be Included in the Record on Appeal is attached as Exhibit "A." In his Designations, Respondent designated, among other things, the following;

1. Order Granting Motion to Dismiss, filed February 18, 2014;
2. Order of Judgment Upon New Trial (C/A No.: 2009-CP-38-1696);
3. Master-in-Equity Order, filed November 3, 2010 (C/A No.: 2009-CP-38-1696);

4. Complaint;
5. Amended Complaint;
6. Verified Answer;
7. Motion to Dismiss;
8. Motion for Summary Judgment and attached documents;
9. Requests to Admit and attached documents;
10. Affidavit of Leslie A. Cotter, Jr. and
11. Offer of Judgment.

These items were not included in the Record on Appeal. A copy of the index from the Record on Appeal prepared by Appellant is attached hereto as Exhibit "B."

Respondent is willing to prepare this supplemental record. Accordingly, Respondent Dennis Wayne Catoe respectfully moves for an Order permitting him to supplement the Record on Appeal to include the above-referenced items. Respondent also requests the Court to stay the deadline for the filing of the Final Briefs until twenty (20) days after the supplemental Record on Appeal is served.

Respectfully submitted,



---

Leslie A. Cotter, Jr., Esquire  
Carmen V. Ganjehsani, Esquire  
Richardson Plowden & Robinson, P.A.  
1900 Barnwell Street  
Columbia, South Carolina 29201  
803-771-4400

*Attorneys for Respondent*

May 26, 2016.  
Columbia, South Carolina

# Exhibit "A"

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY

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Court of Common Pleas

DEC 22 2015

J. Ernest Kinard, Jr., Circuit Court Judge  
Tanya A. Gee, Circuit Court Judge

**SC Court of Appeals**

Civil Action No.: 2013-CP-40-05675

Appellate Case No.: 2015-001627

Willie J. Riley .....Appellant,

vs.

Dennis Wayne Catoe and Does.....Defendants

Of Whom Dennis Wayne Catoe is the.....Respondent.

**DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent proposes the following to be included in the Record on Appeal:

1. Order denying Motion for Reconsideration
2. Order Granting Motion for Summary Judgment
3. Order Granting Motion to Dismiss, filed February 18, 2014
4. Order of Judgment Upon New Trial (C/A No.: 2009-CP-38-1696)
5. Master-in-Equity Order, filed November 3, 2010 ((C/A No.: 2009-CP-38-1696)
6. Complaint
7. Amended Complaint
8. Verified Answer
9. Motion to Dismiss
10. Motion for Summary Judgment and attached documents
11. Motion for Reconsideration
12. Requests to Admit and attached documents
13. Affidavit of Leslie A. Cotter, Jr.
14. Offer of Judgment

15. Letter from William Booth, dated June 3, 2009
16. Transcript of Motion for Summary Judgment Hearing

I certify that this designation contains no matter which is irrelevant to this appeal.

December 22, 2015.

Respectfully submitted,



---

Leslie A. Cotter, Jr., Esquire  
Sheila M. Bias, Esquire  
Richardson Plowden & Robinson, P.A.  
1900 Barnwell Street  
Columbia, South Carolina  
803-771-4400

*Attorneys for Respondent*

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge  
Tanya A. Gee, Circuit Court Judge

Civil Action No.: 2013-CP-40-05675

Appellate Case No.: 2015-001627

Willie J. Riley .....Appellant,

vs.

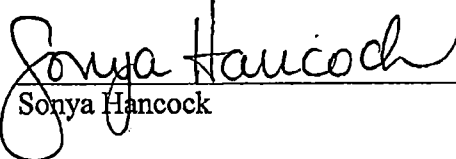
Dennis Wayne Catoe and Does .....Defendants,

Of Whom Dennis Wayne Catoe is the.....Respondent.

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson, Plowden & Robinson, P.A., attorneys for Respondents, do hereby certify that I have this date served the foregoing *Designation of Matter To Be Included In The Record On Appeal* by personally depositing a copy of same in a United States Postal Service mailbox, postage paid, addressed to the following:

Willie J. Riley  
84 Wild Indigo Court  
Columbia, South Carolina 29229  
Pro-se Appellant

  
Sonya Hancock

Dated: December 22, 2015

# Exhibit "B"

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In The Supreme Court]

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MAY 16 2016

**SC Court of Appeals**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge

Tanya A. Gee, Circuit Court Judge

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Case No: 2013-CP-40-05675

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Dennis Wayne Catoe, and Does

Respondent,

V.

Willie J. Riley

Appellant,

---

RECORD ON APPEAL

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Willie J. Riley  
84 Wild Indigo Ct.  
Columbia, SC 29229  
(803) 414-5501  
Pro Se Appellant

Leslie A. Cotter, Jr.,  
Carmen Vaughn Ganjehsan, Esq  
P. O. Drawer 7788  
Columbia, SC 29202  
Attorney for Respondent

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IN THE STATE OF SOUTH CAROLINA  
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Civil Action No.: 2013-CP-40-05675

Appellate Case No.: 2015-001627

Willie J. Riley .....Appellant,


vs.

Dennis Wayne Catoe.....Respondent.

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson, Plowden & Robinson, P.A., attorneys for Respondents, do hereby certify that I have this date served the foregoing *Motion to Supplement the Record on Appeal* by personally depositing a copy of same in a United States Postal Service mailbox, postage paid, addressed to the following:

Willie J. Riley  
84 Wild Indigo Court  
Columbia, South Carolina 29229  
**Pro-se Appellant**

  
Carmen V. Ganjehsani

Dated: May 26, 2016.

**RICHARDSON  
PLOWDEN**  
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202  
1900 Barnwell St., Columbia, SC 29201 P 803.771.4400 F 803.779.0016

MYRTLE BEACH P.O. Box 3646 • Myrtle Beach, SC 29578  
2103 Farlow St., Myrtle Beach, SC 29577 P 843.448.1008 F 843.448.1533

CHARLESTON P.O. Box 21203 • Charleston, SC 29413  
171 Church St., Suite 150, Charleston, SC 29401 P 843.805.6550 F 843.805.6599

www.richardsonplowden.com

REPLY TO: Columbia  
[cganjehsani@RichardsonPlowden.com](mailto:cganjehsani@RichardsonPlowden.com)  
Direct Dial: (803) 253-8692

May 26, 2016

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

Re: Willie J. Riley v. Dennis Wayne Catoe  
Appellate Case No.: 2015-001627  
C/A No.: 2013-CP-40-05675  
RPR File No.: 101-2630

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MAY 27 2016  
SC Court of Appeals

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of Respondent Dennis Wayne Catoe's Motion to Supplement the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on Willie J. Riley, *Pro-se* Appellant.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

CVG

Enclosures

cc: Willie J. Riley, *Pro-se* Appellant (via U.S. Mail)  
Leslie A. Cotter, Jr., Esquire (via email only)

Hasler

05/26/2016

US POSTA



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MAY 27 2016

SC Court of Appeals

101-2630

**RICHARDSON**  
RICHARDSON PLOWDEN ROBINSON, P.A.  
**PLOWDEN**  
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

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



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in 2013  
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