

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM JASPER COUNTY
Court of Common Pleas

SFP 22 2016

SC Court of Appeals

CIVIL ACTION NO.2013-CP-27-00577
Appellate Tracking No.: 2016-000041

Mary Wiggins, as Personal Representative of Kelvin Marquise Wiggins,.....Appellant,

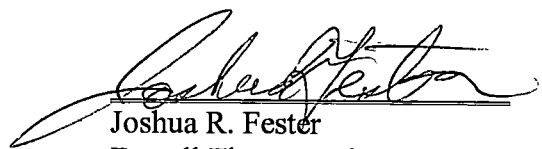
v.

Enterprise Leasing Company-SouthEast, LLC.....Respondents.

MOTION TO FILE SUPPLEMENT TO RECORD ON APPEAL

Appellant, by and through her undersigned attorney, Joshua R. Fester, Esquire, and the consent of Carmelo Barone Sammataro, attorney for Respondent, hereby moves pursuant to Rule 212(b) of the South Carolina Appellate Court Rules, to supplement the Record on Appeal which was served on September 9, 2016.

September 19, 2016



Joshua R. Fester
Darrell Thomas Johnson
Warren Paul Johnson
Law Office of Darrell T. Johnson, Jr.
Post Office Box 1125
Hardeeville, South Carolina 29927
(843) 784-2142
Attorneys for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

CIVIL ACTION NO.2013-CP-27-00577
Appellate Tracking No.: 2016-000041

RECEIVED

SEP 22 2016

SC Court of Appeals

Mary Wiggins, as Personal Representative of Kelvin Marquise Wiggins,.....Appellant,

v.

Enterprise Leasing Company-SouthEast, LLC.....Respondents.

SUPPLEMENT TO RECORD ON APPEAL

Britney F. Boykin
Turner Padgett Graham & Laney, P.A.
40 Calhoun Street, Ste 200
Post Office Box 22129
Charleston, South Carolina, 29401

Carmelo Barone Sammataro
Turner Padgett Graham & Laney, P.A.
Post Office Box 1473
Columbia, South Carolina, 29202

Robert Edward Kneece, III
Turner Padgett Graham & Laney, P.A.
40 Calhoun Street, Suite 200
Post Office Box 22129
Charleston, South Carolina, 29401

Attorneys for Respondent

Darrell T. Johnson, Jr.
Warren Paul Johnson
Joshua R. Fester
Law Office of Darrell T. Johnson, Jr.
Post Office Box 1125
Hardeeville, SC 29927

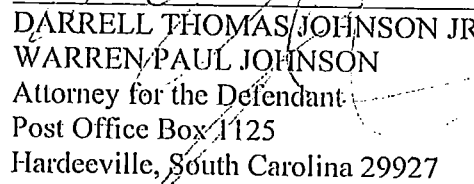
Attorneys for Appellant

INDEX

Plaintiff's Motion to Alter or Amend Judgment.....70A
Certificate of Counsel.....72

issue of whether Mr. Wiggins's death arose out of his assailant's use of the automobile. Plaintiff respectfully requests that this Court set aside its judgment and grant the Plaintiff a new trial.

LAW OFFICE OF
DARRELL THOMAS JOHNSON, JR., LLC



DARRELL THOMAS JOHNSON JR.,
WARREN PAUL JOHNSON
Attorney for the Defendant
Post Office Box 1125
Hardeeville, South Carolina 29927
(843) 784-2142
FAX: 843-784-5770

Dated: October 9, 2015.

70A

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

CIVIL ACTION NO.2013-CP-27-00577
Appellate Tracking No.: 2016-000041

RECEIVED
SFP 22 2016
SC Court of Appeals

Mary Wiggins, as Personal Representative of Kelvin Marquise Wiggins,.....Appellant,

v.

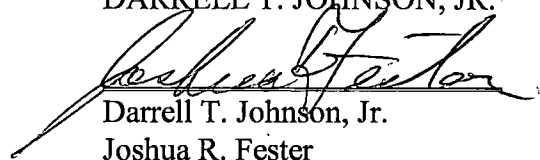
Enterprise Leasing Company-SouthEast, LLC.....Respondents.

PROOF OF SERVICE

I certify that I have served the Motion for Supplement to Record on Appeal on Enterprise Leasing Company-SouthEast, LLC by depositing a copy of it in the United States Mail, postage prepaid, on September 7, 2016, addressed to the attorney of record, Robert E. Kneece, III, Esquire, Turner Padgett Graham & Laney, P.A., Post Office Box 22129, Charleston, South Carolina 29413.

September 19, 2016

LAW OFFICE OF
DARRELL T. JOHNSON, JR.



Darrell T. Johnson, Jr.
Joshua R. Fester
Post Office Box 1125
Hardeeville, South Carolina 29927
(843) 784-2142
Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

CIVIL ACTION NO.2013-CP-27-00577
Appellate Tracking No.: 2016-000041

RECEIVED
SEP 22 2016
SC Court of Appeals

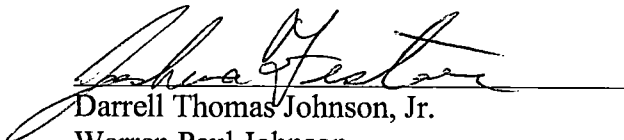
Mary Wiggins, as Personal Representative of Kelvin Marquise Wiggins,.....Appellant,

v.

Enterprise Leasing Company-SouthEast, LLC.....Respondents.

CERTIFICATE OF COUNSEL

Counsel for Appellant certifies that the Record on Appeal complies with Rule 210(g), SCACR and contains no superfluous material.



Darrell Thomas Johnson, Jr.

Warren Paul Johnson

Mills L. Morrison, Jr.

Joshua R. Fester

Law Offices of Darrell Thomas Johnson, Jr., LLC

Post Office Box 1125

Hardeeville, South Carolina 29927

(843) 784-2142

Attorneys for Appellants

LAW OFFICES OF
DARRELL THOMAS JOHNSON, JR., LLC
300 MAIN STREET
POST OFFICE BOX 1125
HARDEEVILLE, SOUTH CAROLINA 29927

DARRELL THOMAS JOHNSON, JR. *
MILLS L. MORRISON, JR. **
WARREN P. JOHNSON
JOSHUA R. FESTER

843.784.2142
FAX 843.784.5770
tdjohnson1@bargrav.com

* Certified Mediator
** Also Licensed in Georgia

September 19, 2016

Ms. Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED

SEP 22 2016

SC Court of Appeals

**RE: Mary Wiggins as Personal Representative of Kelvin Marquise Wiggins v
Enterprise Leasing Company-SouthEast, LLC
Appellate Case No.: 2016-000041**

Dear Ms. Kitchings:

Enclosed for filing is the Motion for the Supplement to Record on Appeal, along with Proof of Service. I have also enclosed a check from this office in the amount of \$25.00 for the cost of filing.

Thanking you in advance, I am

Sincerely,
LAW OFFICE OF
DARRELL THOMAS JOHNSON, JR.


Joshua R. Fester

JRF/tc
Enclosures

Other Counsel of Record:

Ms. Brittany F. Boykin, Esquire
Turner Padget Graham & Laney, P.A.
40 Calhoun Street, Suite 200
Post Office Box 22129
Charleston, SC 29413

Mr. Robert Edward Kneece, III, Esquire
Turner Padget Graham & Laney, P.A.
40 Calhoun Street, Suite 200
Post Office Box 22129
Charleston, SC 29413

Mr. Carmelo Barone Sammataro, Esquire
P.O. Box 1473
Columbia, SC 29202

LAW OFFICE OF
DARRELL THOMAS JOHNSON, JR., LLC
300 MAIN STREET
POST OFFICE BOX 1125
HARDEVILLE, SOUTH CAROLINA 29927



UNITED WE STAND



02 1P

0001879788 SEP 19 2016

MAILED FROM ZIP CODE 29927

PITNEY BOWES
\$ 006.80⁰

Ms. Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED

SEP 22 2016

SC Court of Appeals