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THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM THE COURT OF COMMON PLEAS

Honorable G. Thomas Cooper, Jr.

Circuit Court Case No.: 2007-CP-40-03365

Appellant Case No. 2014-001373

RECEIVED

JUN 05 2017

SC Court of Appeals

Estate of Edward Mims,
Laura M. Cole, Personal Representative,
Appellant,

vs.

The South Carolina Department of Disabilities
and Special Needs, Kathi Lacy and Stan
Butkus,
Respondents.

MOTION TO SUPPLEMENT RECORD

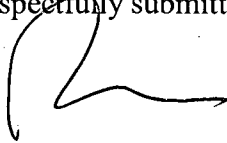
In preparing for oral argument in this case, counsel discovered that three pages were accidentally omitted from the document captioned "Plaintiff's Memorandum in Support of Motion for Partial Summary Judgment" contained at R. 412 in Volume II (pages 4 through 7 missing). Counsel has attempted to contact opposing counsel by phone twice before filing this motion requesting permission to file the complete memorandum that was filed in the lower court as a Supplemental Volume to the Record on Appeal.

The proposed Supplemental Volume contains only the body of the memorandum.

Exhibits that are referenced in the memorandum are located in Volumes VI through XII of the Record on Appeal. These Volumes of the Record on Appeal contain the exhibits which were identified as Volume I through VI in the lower court.

Counsel apologizes for inconvenience caused by this inadvertent omission.

Respectfully submitted,



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Attorney for Appellant Laura Cole, Personal Representative

June 5, 2017

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE COURT OF COMMON PLEAS
Honorable G. Thomas Cooper, Jr.
Circuit Court Case No.: 2007-CP-40-03365

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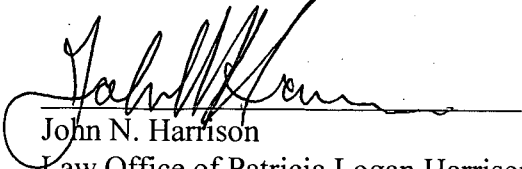
Estate of Edward James Mims,
Laura M. Cole, Personal Representative,
Appellant,

v.

The South Carolina Department of Disabilities
and Special Needs, Kathi Lacy and Stan Butkus,
Respondents.

CERTIFICATE OF SERVICE

I, John N. Harrison, certify that I have served by hand-delivery *Supplemental Volume I* and the accompanying *Motion* to opposing counsel on June 5, 2017, at the address listed below.



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SC Court of Appeals

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June 5, 2017

HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211 734-1890

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Re: **Estate of Edward Mims v. SCDDSN**
Appellate Case No. 2014-001373

JUN 05 2017

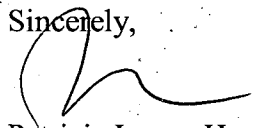
SC Court of Appeals

Dear Ms. Kitchings:

In preparing for this Thursday's oral argument, I discovered that three pages were accidentally omitted from the memorandum in support of Plaintiff's motion for partial summary judgment at R. 0412 in Volume II of the Record on Appeal. Attached is our motion to file a supplemental volume containing the memorandum that was filed in the lower court.

Enclosed is a check for \$25, six copies of the motion and 15 copies of the proposed Supplemental Volume. Copies are being hand delivered to opposing counsel. I apologize for any inconvenience caused by this inadvertent omission.

Sincerely,


Patricia Logan Harrison

Enclosure

c: Kenneth P. Woodington, Esq.
William H. Davidson, II, Esq.

PLH:jnh