

THE STATE OF SOUTH CAROLINA
IN THE SC SUPREME COURT

APPEAL FROM BEAUFORT COUNTY
Marvin H. Dukes III, Master-in-Equity

Appellate Case No 2017-000555

RECEIVED

JUN 23 2017

S.C. SUPREME COURT

Mare Baracco,

PETITIONER

vs.

Beaufort County

Respondent

MOTION TO SUPPLEMENT THE APPENDIX

Mare Baracco, *Pro Se*
1006 Madrid Avenue
Port Royal, South Carolina 29935
843-592-1062
PETITIONER

Mary Bass Lohr
Howell, Gibson & Hughes PA
PO Box 40
Beaufort SC 29901
843-522-2400/522-2429 (fax)
mlohr@hghpa.com
Counsel for Respondent

Mare Baracco, the Appellant herein, petitions this Honorable Court, pursuant to the South Carolina Rules of Civil Procedure, to Supplement the Appendix as follows:

In a related matter between the parties the Respondent admitted to information helpful for this Court to decide the issue before it. Attached is this information.

THEREFORE, the Appellant submits this Supplement to the Appendix for this Honorable Court's review and consideration.

Respectfully submitted, this the 22nd day of June 2017.

A handwritten signature in black ink, appearing to read 'Mare Baracco', is written over a horizontal line.

Mare Baracco, Pro Se
1006 Madrid Avenue
Port Royal South Carolina 29935
(843) 592-1062

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF BEAUFORT) CIVIL ACTION NO: 2017-CP-07-00389

MARE BARACCO,)
Plaintiff,)
vs.) REPLY TO PLAINTIFF'S REQUESTS
BEAUFORT COUNTY,) FOR ADMISSION
Defendant.)

TO: JAMES A. BROWN, JR., ESQUIRE, ATTORNEY FOR PLAINTIFF:

The Defendant, Beaufort County, above named, responding to the Plaintiff's Request to Admit as follows:

1. The email thread attached as Exhibit 1 is a fair and accurate depiction of the emails sent by the county administrator to the chief magistrate.

RESPONSE: Denied.

2. The Plaintiff was not included in the email thread (see Exhibit 1) sent by the county administrator to the chief magistrate.

RESPONSE: Denied. This email thread contains an email from Gary Kubic to the Chief Magistrate, but is not an email thread between the County Administrator and the Chief Magistrate.

3. The underlying action docketed as case number 2012-CV-07-10401536 was civil in nature.

RESPONSE: Admitted.

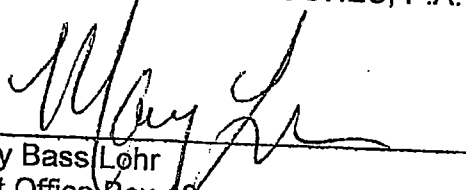
4. The underlying action docketed as case number 2012-CV-07-10401536 was criminal in nature.

RESPONSE: Denied.

5. The underlying action docketed as case number 2012-CV-07-10401536 was appellate in nature.

RESPONSE: Admitted.

HOWELL, GIBSON & HUGHES, P.A.

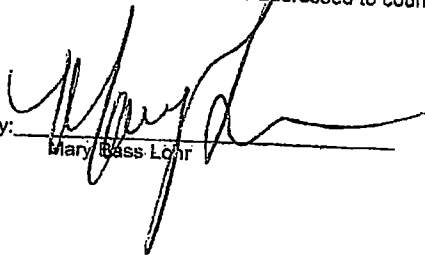
By: 
Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901-0040
(843) 522-2400
Attorney for Beaufort County

Beaufort, South Carolina

May 18, 2017

CERTIFICATE OF SERVICE

I certify that I served the foregoing Reply to Plaintiff's Requests for Admission upon all counsel of record by affixing same with proper postage placing same with the United States Postal Service addressed to counsels' last known address on May 18, 2017.

By: 
Mary Bass Lohr

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PROOF OF SERVICE

I certify I have served the Motion to Supplement the Appendix on the Respondent by depositing copies in the United States Mail, postage prepaid, June 22, 2017, addressed as follows:

Mare Baracco, *Pro Se*
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843-592-1062
PETITIONER

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Counsel for Respondent