

84283

**THE STATE OF SOUTH CAROLINA
In The Court Of Appeals**

**APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas
Carl A. Saleeby, Special Referee**

Case No. 2017-000966

**Thomas E. Goodson, as Trustee of the Residuary
Beneficiaries Trust of the Estate of Margaret S.
Goodson and the Estate of Helen S. Goodson, Respondent,**

v.

**Harriet E. Wilmeth, Debra J. Freeman, Bank of
America, N.A., Lumber Yard, Inc., St. Bartholomew's
Episcopal Church, Canal Wood, LLC, Alexander C.
West, Alexander C. West, Jr., Airport Technologies, LLC,
Mutual Savings Bank, State of South Carolina Department
of Revenue, United States of America Acting through
the Department of Treasury/Internal Revenue Service,
Ford Motor Credit Company, LLC, James Gandy, Estate
of Amelia H. Anthony, Estate of Betty C. Wiggins,
Portfolio Recovery Associ, South Carolina Department
of Probation, Parole and Pardon Services, Norwood
C. Bizzell, Robert "B.W." Bizzell, William E. Bizzell,
Mary Lathan Steele, and Vicki Eaddy, Defendants,**

RECEIVED

AUG 14 2017

SC Court of Appeals

Of Whom Debra J. Freeman is the..... Appellant.

APPELLANT'S MOTION TO FILE AMENDED APPELLANT'S FINAL BRIEF

Robert E. Lee, Esquire
South Carolina Bar # 63052
Robert E. Lee, LLC
111 Witcover Street
Post Office Box 1096
Marion, SC 29571
Telephone: (843) 423-1313
Facsimile: (843) 423-1397
Email: rel@rellawfirm.com

Brittany C. Moore, Esquire S.C. Bar # 102780
Kenneth R. Moss, Esquire S.C. Bar # 15520
Wright, Worley, Pope, Ekster & Moss, PLLC
628-A Sea Mountain Highway
North Myrtle Beach, SC 29582
Telephone: (843) 281-9901
Facsimile: (843) 281-9903
Email: BrittanyMoore@wwpemlaw.com

Attorneys for Appellant

COMES NOW Appellant Debra J. Freeman, by and through her attorneys, and pursuant to Rule 240, S.C.R.A.P, respectfully moves this Court for an order allowing Appellant to file the attached Amended Appellant's Final Brief. In support of Appellant's Motion to File Amended Appellant's Final Brief, Appellant states as follows:

1. The Final Appellant's Brief and the Final Reply Brief of Appellant were timely and duly filed in this Court on or about July 28, 2017. Both the Final Appellant's Brief and the Final Reply Brief of Appellant were also duly served on all parties of record.
2. Several days after the Final Appellant's Brief was filed, it was determined that approximately ten references to pleadings, orders and the transcript in the Statement of Facts, on pages 3, 4 and 5 of the Final Appellant's Brief, were inadvertently improperly referenced. The references in the Statement of Facts were to the name of the actual pleading, orders or to the transcript rather than to the pages in Record on Appeal where these matters are copied.
3. Appellant has corrected those references to the Record on Appeal in the Statement of Facts of the Final Appellant Brief so that the specific pages in the Record on Appeal appear in the Statement of Facts.
4. All references to pleadings, orders, transcripts and exhibits to the transcript, as well as other materials now, in the attached Amended Appellant's Final Brief, consistently refer to the Record on Appeal as "RA" with the correct corresponding page number.
5. The only difference between the Final Appellant Brief filed July 28, 2017, and the

attached Amended Appellant's Final Brief are the "RA" references in the Amended Appellant's Final Brief.

WHEREFORE Appellant Debra J. Freeman respectfully requests that this Court enter an Order allowing Appellant to file and properly serve the attached Amended Appellant's Final Brief.

Date: August 9, 2017

Respectfully submitted:

ROBERT E. LEE, LLC

By: 

Robert E. Lee, Esquire, S. C. Bar # 63052
111 Witcover Street
Post Office Box 1096
Marion, SC 29571
Telephone: (843) 423-1313
Facsimile: (843) 423-1397
Email: rel@rellawfirm.com

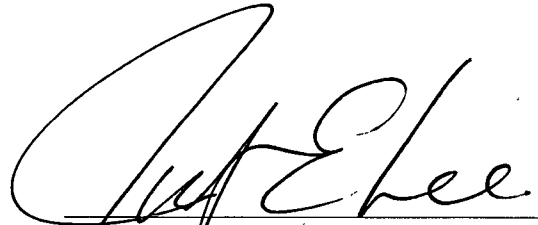
Brittany C. Moore, Esquire S.C. Bar # 102780
Kenneth R. Moss, Esquire, S.C. Bar # 15520
Wright, Worley, Pope, Ekster & Moss, PLLC
628A Sea Mountain Highway
North Myrtle Beach, SC 29582
Telephone: (843) 281-9901
Facsimile: (843) 281-9903
Email: BrittanyMoore@wwpemplaw.com

Attorneys for Appellant

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Appellant's Motion to File Amended Appellant's Final Brief attached thereto, to be mailed, first-class postage prepaid to the following on this 9th day of August, 2017.

J. Alex Stanton, IV, Esquire
Stanton Law Firm
954 West Carolina Avenue
Hartsville, SC 29550
Counsel for the Respondent



Robert E. Lee, Esquire

RECEIVED

AUG 14 2017

SC Court of Appeals