

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

AUG 17 2017

SC Court of Appeals

The Honorable R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2017-000267

Carla Denise Garrison and Clint Garrison.....Appellants,

v.

Target Corporation.....Respondent.

**UNOPPOSED MOTION FOR LEAVE  
TO CORRECT FINAL BRIEFS**

Appellants/Cross Respondents Carla Denise Garrison and Clint Garrison request permission to revise their Final Briefs as follows:

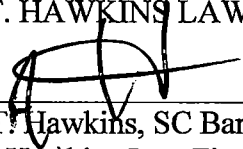
1. All parties have filed their Initial Briefs in this case, and the record has been served.
2. The parties are in the process of preparing and filing their Final Briefs.
3. In preparing their Final Briefs, the Garrisons have realized that an unintentional factual error was included in their Initial Briefs. On page 14 of the Garrisons' Initial Appellants' brief, and on page 14 of the Initial Respondent's Brief, the following sentence appears: "Target filed a response and the Garrisons filed a rebuttal." The Garrisons did not in fact file a rebuttal in the trial court.
4. In light of this unintentional error, the Garrisons request that they be allowed to edit the sentence as follows in their Final Briefs: "Target filed a response and the Garrisons did not file a rebuttal."

5. As reflected in Exhibit A to this motion, Counsel for Respondent/Cross Appellant does not object to the Garrisons being permitted to make this change in their Final Briefs.
6. The Final Briefs currently are due on August 21, 2017.
7. The Garrisons request that both parties be given 10 days from the entry of a ruling on this motion to file their Final Briefs.

For these reasons, the Garrisons request that they be granted leave to amend their Final Briefs and that both parties be given 10 days from the entry of a ruling on this motion to file their Final Briefs.

Respectfully submitted,

THE J.T. HAWKINS LAW FIRM, LLC



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Joshua T. Hawkins, SC Bar #78470  
The J.T. Hawkins Law Firm, LLC  
1225 South Church Street  
Greenville, South Carolina 29605  
Tel: (864) 275-8142

G. Todd Butler, MS Bar #102907  
Phelps Dunbar LLP  
4270 I-55 North  
Jackson, Mississippi 39236-6114  
Tel: (601) 352-2300  
**Attorneys for Appellant**

## Paralegal

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**From:** Elliker, Kevin <KElliker@hunton.com>  
**Sent:** Friday, August 11, 2017 9:38 AM  
**To:** Todd Butler (3366)  
**Cc:** Knox Haynsworth; Sibley, Trey; Josh Hawkins; Paralegal  
**Subject:** RE: Garrison v. Target

Hi Todd --

No objections from us.

Thanks,  
Kevin

---

-----Original Message-----

**From:** Todd Butler (3366) [mailto:Todd.Butler@phelps.com]  
**Sent:** Thursday, August 10, 2017 6:20 PM  
**To:** Elliker, Kevin  
**Cc:** Knox Haynsworth; Sibley, Trey; josh@jthawkinslaw.com; Paralegal  
**Subject:** RE: Garrison v. Target

Kevin - In preparing our final briefs, I caught an error on page 14 of our initial appellants' brief and on page 14 of our initial respondent's brief. The sentence in question is this: "Target filed a response and the Garrisons filed a rebuttal." Because we considered but ultimately did not file a rebuttal, it should read like this: "Target filed a response and the Garrisons did not file a rebuttal." Is there any objection to a motion for leave to make this change in the final briefs? Please let me know. Thanks. /Todd

Exhibit A

**CERTIFICATE OF SERVICE**

I, Joshua T. Hawkins, certify that I filed this **UNOPPOSED MOTION FOR LEAVE TO CORRECT FINAL BRIEFS** with the Clerk of the Court and sent copies to the following by certified mail:

Mr. Knox L. Haynsworth, III  
Brown, Massey, LLC  
106 Williams Street  
Greenville, South Carolina 29601

Attorneys Powell, Sibley, and Elliker  
Hunton and Williams, LLP

Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219

**ATTORNEYS FOR RESPONDENT/CROSS APPELLANTS**

The Honorable Alan Wilson  
South Carolina Attorney General  
P.O. Box 11549  
Columbia, S.C. 29211

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SC Court of Appeals

THIS, the 15<sup>th</sup> day of August, 2017.

  
\_\_\_\_\_  
JOSHUA T. HAWKINS

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Fax: (864) 752-0911  
josh@jthawkinslaw.com

August 15, 2017

Ms. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

Ms. Rosalyn W. Frierson, Director  
South Carolina Court Administration  
Calhoun Building  
~~1220 Senate Street, Suite 200~~  
Columbia, South Carolina 29201-3739

Re: *Carla Denise Garrison and Clint Garrison, Appellants v. Target Corporation, Respondent*  
Appellate Case No.: 2017-000267  
Trial Court Case No.: 2014-CP-04-01426 *consolidated with* 2105-CP-04-02206

Dear Madams:

Please find enclosed the Garrisons' Unopposed Motion for Leave to Correct Final Briefs in the appellate case referenced above, together with a Certificate of Service and the \$25.00 filing fee (included in the mailing to the Clerk of Court).

If anything in this filing is *not* correct, or if there is additional information we should be aware of, please do not hesitate to contact our office.

Sincerely,



David Schroeder, PhD, CP  
Paralegal to Joshua T. Hawkins

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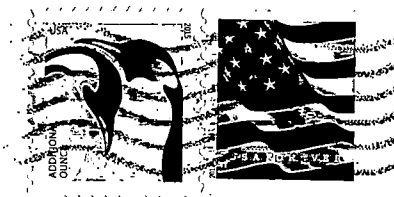
SC Court of Appeals

Enclosures

The J.T. Hawkins Law Firm, LLC  
1225 South Church Street  
Greenville, South Carolina 29605

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SC Court of Appeals

Ms. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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