

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

OCT 11 2017

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Appellate Case No.: 2016-000986

Porthemos Curry.....Respondent/Appellant,

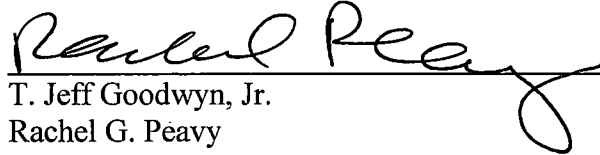
v.

Carolina Insurance Group of SC, Inc. and Maurice
Derrick.....Appellants/Respondents.

CONSENT MOTION TO SUPPLEMENT RECORD ON APPEAL

Pursuant to Rule 212, SCACR, Respondent/Appellant, *with the consent of counsel for Appellants/Respondents, Wesley R. Peel, Esq.*, hereby moves to supplement the Record on Appeal to include the Motion for Relief pursuant to Rule 60(b), SCRCF; Memorandum in Opposition; Reply; and Form 4 Order. The parties propose to file such documents within an Appendix to the Record on Appeal.

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr.
Rachel G. Peavy
2519 Devine Street, Suite A
Columbia, SC 29205
(803) 251-4517 (office)
Attorneys for Respondent/Appellant

October 10, 2017

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

OCT 11 2017
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Appellate Case No.: 2016-0006986

Porthemos Curry,.....Respondent/Appellant,

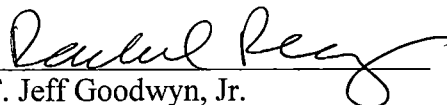
v.

Carolina Insurance Group of SC, Inc. and Maurice
Derrick.....Appellants/Respondents

PROOF OF SERVICE

I certify that I have served the **Respondent/Appellant's Amended Initial Brief** along with **Respondent/Appellant's Amended Designation of Matter to be Included in the Record on Appeal and Consent Motion to Supplement Record on Appeal**, on Wesley D. Peel, Esquire, Esquire, Attorney for the Appellants/Respondents, at the address listed below by depositing a copy of same in the United States Mail, postage prepaid, on October 11th, 2017.

Wesley D. Peel, Esquire
Bruner Powell Wall & Mullins, LLC
Post Office Box 61110
Columbia, SC 29260-1110



T. Jeff Goodwyn, Jr.
Rachel G. Peavy
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, South Carolina 29205
(803) 251-4517
Attorneys for Respondent

October 11th, 2017

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
Christopher J. Archer

Special Counsel:
Rachel G. Peavy

Of Counsel:
E. Crosby Lewis

*Also Licensed in Georgia

Reply to:
2519 Devine Street
Suite A
Columbia, South Carolina 29205

111-B Congress Street
Winnsboro, South Carolina 29180

Tel. (803) 251-4517 (Columbia)
Fax (803) 251-4527

Tel. (803) 635-1920 (Winnsboro)
Fax (803) 635-2100

Email: Contact@Goodwynlaw.com
Web: www.GoodwynLaw.com

October 11, 2017

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED

OCT 11 2017

SC Court of Appeals

RE: *Porthemos Curry v. Carolina Insurance Group of SC, Inc. and Maurice Derrick*
Appellate Case No.: 2016-000986
Our File No.: 3000-0106

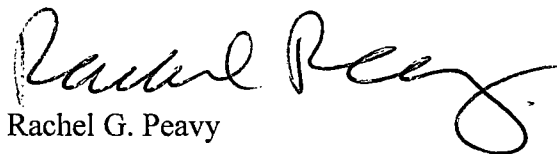
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the **Amended Initial Brief of Respondent/Appellant and Designation of Matter to Be Included in the Record on Appeal**, along with the Proof of Service, in regard to the above-referenced matter. I also enclose an original and one copy of a consent motion to supplement the existing record on appeal, by way of an appendix.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of the Initial Brief of Respondent/Appellant and Designation of Matter, along with the motion, upon Wesley D. Peel, Esquire, attorney for the Appellants/Respondents. I spoke with Mr. Peel and he advised me that Bryan J. Triplett has left the firm.

Should you have any questions, please don't hesitate to contact me.

Very truly yours,



Rachel G. Peavy

RGP/
Enclosures

cc: Wesley D. Peel, Esquire (w/encl.) (via US Mail)
Porthemos Curry (w/encl.) (via US Mail)