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March 22, 2018

Writer's Email: kwoodington@dml-law.com

Hand Delivered

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
1231 Gervais Street
Columbia, South Carolina 29201

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MAR 22 2018

S.C. SUPREME COURT

RE: Estate of Edward James Mims, Laura M. Cole, Personal Representative v. The South Carolina Department of Disabilities and Special Needs, Kathi Lacy, and Stan Butkus
Appellate Case Number: 2014-001373
Civil Action Number: 2007-CP-40-3365
Claim Number: 44654
Our File Number: 104.7785

Dear Mr. Shearouse:

Please find enclosed for filing the original and seven (7) copies of the **Corrected Petition for Writ of Certiorari** in the above referenced matter. Also, enclosed please find the original and two (2) copies of the Record on Appeal, as described below. Please file the originals and return a clocked-in copy to me by way of my courier. I have not enclosed the filing fee since Petitioners are exempt. I realize that the Court has dismissed this petition without prejudice, but my understanding from your office was that these corrections should be filed anyway.

By copy of this letter, I am serving a copy of the Corrected Petition on all counsel of record as well as the Clerk of the Court of Appeals.

In the course of complying with the Court's instruction to make certain redactions and to eliminate certain handwritten additions to documents, we realized that the version of the Record on Appeal that was filed on March 19, 2018 was taken from a scan in our file of the first version of the Record on Appeal. Counsel for the Appellant thereafter filed a corrected version, with different page numbers. The version of the Record on Appeal that is enclosed with this letter is the corrected version, that is, the final version filed with the Court of Appeals by opposing counsel, and downloaded from C-Track. We have made redactions of personal information where required. In addition, where the Record on Appeal contains underlining or handwriting not on the documents as presented to the circuit court, we have removed that underlining or

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handwriting, either by redaction or by substituting clean pages.

Also, upon realizing that there were two versions of the Record on Appeal, with different page numbers, I reviewed the Petition for Certiorari and found a few references that were to the old, superseded, version of the Record on Appeal. The enclosed Corrected Petition corrects those erroneous references, as well as a few typographical errors in citation to the record. The corrections are as follows:

- p. 3: changed "R. IV, 638-1049" to "R. IV, 638-1048."
- p. 4: changed "R. III, 597" to "R. III, 502."
- p. 5: changed "R. III, 599" to "R. III, 470," and deleted a duplicate citation to the same document elsewhere in the record.
- p. 13: changed "R. III, 544-577" to R. III, 593-626.
- p. 19: changed "66, 67" to "66, 68;" n. 15, changed "Paragraph 67" to "Paragraph 68."
- p. 23: changed "R. I, 40 n.2" to R. I, 40, n. 5."

Thanks you for your consideration in getting this straightened out.

With highest regards, I am

Sincerely yours,

DAVIDSON, WREN & PLYLER, P.A.



Kenneth P. Woodington

KPW/mss
Enclosures

cc: (w/ Enclosures)

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