

THE STATE OF SOUTH CAROLINA
IN THE SOUTH CAROLINA COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS

Karl A. Folkens, Special Referee

Appellate Case No.: 2017-001646

Jericho State Capital Corp. of Florida.....Plaintiff,

v.

Chicago Title Insurance Company.....Defendant,

AND

Lynx Jericho Partners, LLC.....Plaintiff,

v.

Chicago Title Insurance Company.....Defendant.

Of whom Jericho State Capital Corp. of Florida and Lynx Jericho Partners, LLC are the
Appellants,

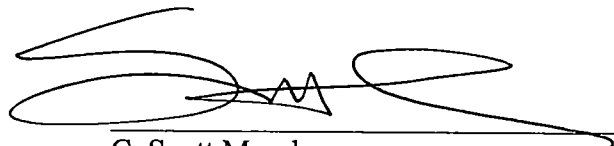
And Chicago Title Insurance Company is the Respondent.

**APPELLANTS' MOTION TO AMEND/CORRECT
THE RECORD ON APPEAL
AND TO STAY THE DEADLINE TO FILE FINAL BRIEFS**

Appellants hereby move to amend or correct the Record on Appeal and to stay the deadline for both parties to file their final briefs. The undersigned has confirmed that Respondent's counsel consents to this motion. Appellants state the following grounds in support thereof:

1. By cover letter and certificate of service dated March 13, 2018, Appellants served the Record on Appeal upon Respondent. On that same day, Appellants filed the Record on Appeal with the Court.

2. Based on the above filing, the parties' final briefs are due on Monday, April 2, 2018.
3. Today, as the parties were preparing final briefs, it was noticed that the printer omitted certain page numbers within the Record on Appeal.
4. The Record on Appeal is four (4) volumes containing 1986 pages. It appears that on the following pages, the page numbers were cut-off and are not visible: 412-424, 516-532, 606-668; and on the following pages, the page numbers are difficult to read on the bottom of the pages: 719-721, 673, and 719. This is an error by the printer that the undersigned did not notice at the time of filing and service.
5. Rather than correcting, reprinting and rebinding all copies of the entirety of the voluminous record at very substantial cost, Appellants request/move for the opportunity to travel to the court to make the necessary changes on the original Record on Appeal and serve the corrected pages upon Respondent. With Good Friday and the Easter weekend approaching, and with the undersigned visiting family in Chicago through April 3, 2018, Appellants request until April 5, 2018 to complete this task.
6. Appellants further move that the filing deadline for the final briefs be stayed/extended until 10 days after the Record on Appeal is corrected as set forth above and the corrections served on Respondent.
7. Counsel for the Respondent consents to this motion.



C. Scott Masel
Newby Sartip Masel & Casper, LLC
P.O. Box 808
Myrtle Beach, SC 29578
843/449-9417
Attorney for Appellants

March 28, 2018

THE STATE OF SOUTH CAROLINA
IN THE SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS
Karl a. Folkens, Special Referee
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Of whom Jericho State Capital Corp. of Florida and Lynx Jericho Partners, LLC are the Appellants,

And Chicago Title Insurance Company is the Respondent.

PROOF OF SERVICE

As an employee of Newby Sartip & Masel, LLC, attorneys for the Appellant, I certify that on 3/29/18, I served a copy of the **Appellant's Motion to Amend/Correct the Record on Appeal and to Stay the Deadline to File Initial Briefs** in the above case upon counsel for the Respondent via U.S. Mail, addressed as follows:

Demetri K. Koutrakos
1812 Lincoln Street, Suite #200
Columbia, South Carolina 29202


Erika Noland

NEWBY, SARTIP, MASEL & CASPER, LLC
ATTORNEYS AT LAW

FRED B. NEWBY
MICHAEL H. SARTIP†
C. SCOTT MASEL‡
JULIET M. CASPER†
MATTHEW W. VAN WIE

†ALSO ADMITTED IN N.C.
‡ALSO ADMITTED IN W. VA
◊ALSO ADMITTED IN IN.
◊ALSO ADMITTED IN GA.
◊ALSO ADMITTED IN FL.

4593 OLEANDER DRIVE, SUITE 100
POST OFFICE BOX 808
MYRTLE BEACH, SOUTH CAROLINA 29578-0808

TELEPHONE (843) 449-9417
FACSIMILE (843) 449-9419
REAL ESTATE FACSIMILE (843) 429-1362
E-mail nps@newbylaw.com

March 29, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

VIA FEDEX OVERNIGHT

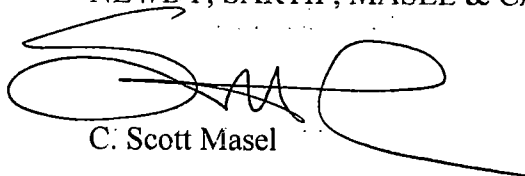
RE: Jericho State Capital v. Chicago Title Insurance
Lynx Jericho partners v. Chicago Title Insurance
Appellate Case No.: 2017-001646

Dear Ms. Kitchings:

Enclosed please find the following the original and six (6) copies of **Appellant's Motion to Amend/Correct the Record on Appeal and to Stay the Deadline to File Initial Briefs**, together our check for \$25.00 for the filing fee. By copy of this letter and as reflected on the attached certificate of service, this motion is being served upon Respondent's counsel. Please let me know of any questions.

Very truly yours,

NEWBY, SARTIP, MASEL & CASPER


C. Scott Masel

Enclosures

Cc (w/enc): Demetri "Jim" K. Koutrakos

11

ORIGIN ID:MYRA (843) 429-2000
ERIKA NOLAN
NEWBY, SARTIP, AND MASEL LLC
4593 OLEANDER DR.

SHIP DATE: 29MAR18
ACTWGT: 0.50 LB
CAD: 103640084/INET3980

MYRTLE BEACH, SC 29577
UNITED STATES US

BILL SENDER

TO CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

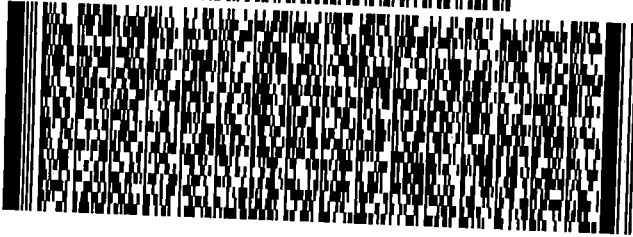
COLUMBIA SC 29211

(803) 734-1890

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SC Court of Appeals

3/29/2018