

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson Jr., Circuit Court Judge
Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-000460

RECEIVED
JUL 02 2018
SC Court of Appeals

Assistive Technology Medical
Equipment Services, LLC, Respondent,

v.

Hood & Selander, CPAS, LLC; Donna Cash, as
Representative of the Estate of Dorothy Connelly;
W. Applegate, III, as Personal Representative of the
Estate of James B. Connelly; Kimberly Cuce;
and Phillip DeClemente. Defendants,

Of whom, Phillip DeClemente is the Appellant.

**MOTION TO AMEND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rules 209 and 240 of the South Carolina Appellate Court Rules, the
Appellants move for permission to Amend their Designation of Matters to be Included in the
Record on Appeal, timely filed together with Appellant's Initial Brief.

The grounds for this motion are that Appellant inadvertently included some matters not addressed in the Initial Brief and inadvertently failed to designate the Affidavit of Default, filed March 30, 2012.

Pursuant to the Rules, Appellant wishes to take careful measures to present the court with only materials critical to a decision. Counsel for the Appellant hereby certifies that he has attempted in good faith to resolve the issues on the Designation of Matters. The Respondent will not be prejudiced if this motion is granted, as these proposed amendments to Appellant's Designation of Matters are made in an attempt to comply with the rules and conserve time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cameron L. Marshall", written over a horizontal line.

Cameron L. Marshall,
7 Gamecock Avenue, Ste. 707
Charleston, South Carolina 29407
S.C. Bar #64192
Telephone: (843) 795 – 2298
cameron@attorneymarshall.com
Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson Jr., Circuit Court Judge
Deadra L. Jefferson, Circuit Court Judge

RECEIVED
JUL 02 2018
SC Court of Appeals

Case No. 2018-000460

Assistive Technology Medical
Equipment Services, LLC, Respondent,

v.

Hood & Selander, CPAS, LLC; Donna Cash, as
Representative of the Estate of Dorothy Connelly;
W. Applegate, III, as Personal Representative of the
Estate of James B. Connelly; Kimberly Cuce
and Phillip DeClemente Defendants,

Of whom, Phillip DeClemente is the Appellant.

PROOF OF SERVICE

The undersigned herby certifies that on the date indicated below he served the counsel of record with a copy of the MOTION TO AMEND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AMENDED DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL and the AMENDED INITIAL BRIEF OF APPELLANT by email and by mailing copies of the same by United States Mail, postage prepaid, on June 28, 2018, addressed to James E. Smith, 1422 Laurel Street, Columbia, South Carolina, 29201 and Blake Hewitt, P.O Box 7965, Columbia, South Carolina, 29202.

June 28, 2018
Charleston, SC



Cameron Marshall
Attorney
CAMERON MARSHALL LAW FIRM, LLC



June 27, 2018

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

RE: Assistive Technology Medical Equipment Services, LLC v.
Phillip DeClemente
Appellate Case No.: 2018 – 0004640

RECEIVED

JUL 02 2018

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed the following documents:

- 1) Original (*unbound*) Amended Initial Brief of Appellant;
- 2) Original Motion to Amend Designation of Matter to be Included in the Record on Appeal;
- 3) Original (*unbound*) Amended Designation of Matter to be Included in the Record on Appeal;
- 4) Original Proof of Service on opposing counsel; and
- 5) Original Certificate of Counsel.

With best regards,

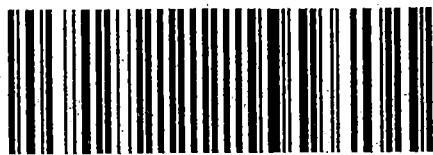
Cameron L. Marshall
cameron@attorneymarshall.com

cc: James E. Smith Jr., Esquire
Blake Hewitt, Esquire

7017 1000 0000

PLACE STICKER AT TOP OF ENV
OF THE RETURN ADDRESS, FL

CERTIFIED MAIL®



7017 1000 0000 2297 5764

7 Church Street Avenue, Suite 707
Charleston, SC 29407

South Carolina Court of Appeals
Clerk's Office
Exchange Station

South Carolina Court of Appeals
Clerk's Office
PO Box 11629
Columbia, SC 29211



1000



29202

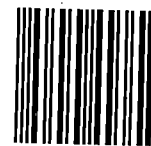
U.S. POSTAGE
PAID
CHARLESTON, SC
29407
JUN 28, 18
AMOUNT

\$3.31

R2304E105303-05



1000



29211

U.S. POSTAGE
PAID
CHARLESTON, SC
29407
JUN 28, 18
AMOUNT

\$3.24

R2304E105303-05

6/28