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ATTORNEYS AND COUNSELORS AT LAW

**FACSIMILE COVER SHEET**

**RECEIVED**

OCT 02 2018

S.C. SUPREME COURT

**DATE:** October 2, 2018  
**TO:** The Honorable Daniel E. Shearouse  
South Carolina Supreme Court  
**CC:** Robert E. Tyson, Jr., Esquire (via regular mail)  
Joseph O. Thickers, Esquire (via regular mail)  
Harrison D. Brant, Esquire (via regular mail)  
Thomas Parkin C. Hunter, Esquire (via regular mail)  
Shaun C. Kent, Esquire (via regular mail)  
**NUMBER:** (803) 734-1499  
**FROM:** Kimberly V. Barr, Esquire  
**RE:** Bucky Mock vs. LaNette Samuels-Cooper, et. al  
Appellate Case No.: 2018-001520

**TRANSMITTING (7) PAGES(S), INCLUDING COVER SHEET**

\*IF INDICATED PAGES ABOVE ARE NOT RECEIVED, PLEASE ADVISE.

**COMMENTS/MESSAGE:** Please see attached correspondence.

**CONFIDENTIALITY NOTE:** The information contained in this facsimile message is legally privileged and confidential and is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this telecopy is strictly prohibited. If you have received this telecopy in error, please notify us by telephone immediately and destroy this message. THANK YOU.

**RONNIE A. SABB**  
**KIMBERLY V. BARR**  
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**Via U.S. Regular Mail and Facsimile: (803) 734-1499**

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

S.C. SUPREME COURT

RE: Bucky Mock vs. Clarendon County Board of Voter Registration & Elections, et al.  
 Appellate Case No.: 2018-001520

Dear Mr. Shearouse:

In connection with the matter referenced above, please find enclosed for filing the original and six (6) copies of the Return of Appellant-Respondent to Motion of Respondent-Appellant to Supplement the Record on Appeal.

By copy of this letter, I am serving the Return of Appellant-Respondent to Motion of Respondent-Appellant to Supplement the Record on Appeal on all attorneys to this action.

With kindest regards, I am

Very truly yours,

  
 Kimberly V. Barr

Enclosures

cc: Robert E. Tyson, Jr., Esquire and Vordman C. Traywick, III, Esquire (w/ enclosures)  
 Shaun C. Kent, Esquire (w/ enclosures)  
 Joseph O. Thickens, Esquire (w/ enclosures)  
 Thomas Parkin C. Hunter, Esquire (w/ enclosures)  
 Harrison D. Brant, Esquire (w/ enclosures)

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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OCT 02 2018

APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas  
R. Ferrell Cothran, Jr., Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No.: 2018-001520

Bucky Mock, ..... Respondent-Appellant,

vs.

Clarendon County Board of Voter Registration  
& Elections, Clarendon County Democratic  
Party, LaNette Samuels-Cooper, South Carolina  
Democratic Party, and South Carolina Election  
Commission, Defendants,

Of whom LaNette Samuels-Cooper is ..... Appellant-Respondent.

And Clarendon County Board of Voter Registration  
& Elections, Clarendon County Democratic  
Party, South Carolina Democratic Party, and  
South Carolina Election Commission are ..... Respondents.

**RETURN OF APPELLANT-RESPONDENT TO MOTION  
OF RESPONDENT-APPELLANT TO SUPPLEMENT  
THE RECORD ON APPEAL**

The undersigned attorney for the appellant-respondent hereby objects to the motion of respondent-appellant to supplement the record on appeal. In support of this objection, the undersigned would show that in compiling the record on appeal, she delivered to Mock's counsel (at his request) the transcripts from the July 20, 2018, July

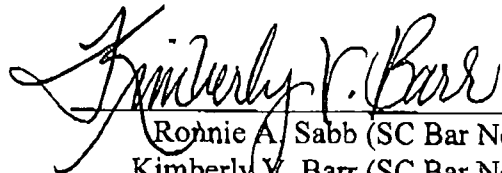
27, 2018 and August 13, 2018 hearings in this matter on September 11, 2018. Further, counsel downloaded the pleadings, motions and orders in this case from the Clarendon County public index, drafted a list of documents proposed to be included in the record on appeal and disseminated that list to all counsel of record. The list is attached hereto as "Exhibit A." The electronically filed summons and complaint from the website did not have any attachments. Mr. Tyson, Mock's counsel, communicated by email with the undersigned on September 13, 2018 to confirm that he consented to documents identified to be included in the record. No additional documents were sought to be included in the record. By September 21, 2018, all attorneys had consented to the documents in the list being included in the record on appeal, and the undersigned communicated that information to Mock's counsel the same day to enable him to calculate the due date for his brief.

While nearing the preparation of the record, the undersigned realized that she was missing two exhibits that Mock introduced at trial. On Wednesday, September 26, 2018, Ms. Hodge, another attorney in the firm, requested that Mr. Tyson email her copies of these documents to be included in the record. In response, he suggested that she contact the clerk's office for copies. Although the clerk's office graciously agreed to provide the documents to her, there was some delay because a term of court was in session. The record was completed on Thursday, September 27, 2018. Despite not yet finalizing her brief and working with a reduced number of staff members on Thursday, the undersigned arranged to have the 470-page record scanned and emailed to Mr. Tyson. In addition, a bound copy was sent by priority mail to all attorneys to this action the same day.

The following day, the undersigned was out of the office attending a mediation. Mr. Tyson spoke with Ms. Hodge about documents he asserted were not included in the record. Ms. Hodge noted that several documents he referenced, including but not limited to each party's filing affidavit, an April 2018 letter from the South Carolina Democratic Party, and a letter from the President of the South Carolina Coroners' Association, were included in the prepared record.

Based on the foregoing, the undersigned respectfully requests that the motion of respondent-appellant be denied given that the parties consented in writing to the documents contained in the record. In the alternative, if the motion is granted, appellant-respondent requests that the movant be solely responsible for the preparation and filing of a supplemental record on appeal at his expense.

**SABB LAW GROUP, L.L.C.**



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Kimberly M. Hodge (SC Bar No.: 103450)  
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October 2, 2018

Attorneys for Appellant-Respondent

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas  
R. Ferrell Cothran, Jr., Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No.: 2018-001520

Bucky Mock, ..... Respondent-Appellant,

vs.

Clarendon County Board of Voter Registration  
& Elections, Clarendon County Democratic  
Party, LaNette Samuels-Cooper, South Carolina  
Democratic Party, and South Carolina Election  
Commission, Defendants,

Of whom LaNette Samuels-Cooper is ..... Appellant-Respondent.

And Clarendon County Board of Voter Registration  
& Elections, Clarendon County Democratic  
Party, South Carolina Democratic Party, and  
South Carolina Election Commission are ..... Respondents.

CERTIFICATE OF SERVICE

The undersigned attorney for the appellant-respondent hereby certifies that her return to the motion of respondent-appellant to supplement the record on appeal was served on all parties to this action on October 2, 2018 by depositing a copy of the same in the U.S. mail, with sufficient postage attached, and addressed to their respective attorneys of record as follows:

Robert E. Tyson, Jr. and Cordman Carlisle Traywick, Esquires  
Post Office Box 11449  
Columbia, South Carolina 29211  
(Attorneys for Respondent-Appellant Bucky Mock)

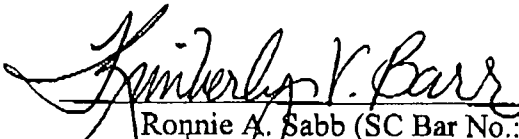
Joseph O. Thickens, Esquire  
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1324 Gadsden Street  
Columbia, South Carolina 29201  
(Attorneys for Respondents Clarendon County Democratic Party and South Carolina Democratic Party)

Harrison David Brant, Esquire  
1122 Lady Street, Suite 500  
Columbia, South Carolina 29201  
(Attorney for Respondent South Carolina State Election Commission)

Thomas Parkin Hunter, Esquire  
South Carolina Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29209  
(Attorney for Respondent South Carolina State Election Commission)

Shaun C. Kent, Esquire  
Post Office Box 117  
Manning, South Carolina 29102  
(Attorney for Respondent Clarendon County Board of Voter Registration and Election)

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October 2, 2018

Attorneys for Appellant-Respondent