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ROBERT E. TYSON, JR.

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October 3, 2018

RECEIVED

OCT 03 2018

S.C. SUPREME COURT

BY HAND-DELIVERY

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

Re: Bucky Mock v. Clarendon Co. Board of Voter Registration & Elections, et al.
Appellate Case No.: 2018-001520
File No. 7186/1500

Dear Mr. Shearouse:

Enclosed please find the original and seven copies of the Reply in Support of Motion to Supplement the Record on Appeal of Respondent-Appellant along with Proof of Service.

I would appreciate your filing as appropriate and returning a clocked-in copy of each via our courier.

By copy of this letter, and as evidenced by the Proof of Service, I am serving same upon counsel of record.

Sincerely,

Robert E. Tyson, Jr.

Enclosures

cc: Ronnie A. Sabb, Esq.
Kimberly V. Barr, Esq.
Kimberly M. Hodge, Esq.
Shaun Kent, Esq.
J. Eric Cavanaugh, Esq.
Joseph Thickens, Esq.
T. Parker Hunter, Esq.
Harrison D. Brant, Esq.

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

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R. Ferrell Cothran, Jr., Circuit Court Judge S.C. SUPREME COURT

Appellate Case No. 2018-001520

Bucky Mock,

Respondent-Appellant,

v.

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.

**RESPONDENT-APPELLANT BUCKY MOCK'S REPLY IN SUPPORT OF
MOTION TO SUPPLEMENT THE RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, Respondent-Appellant Bucky Mock submits this reply to Appellant-Respondent LaNette Samuels-Cooper's return in opposition to his motion to supplement the Record on Appeal.

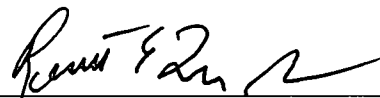
Mock writes only to clarify that, as demonstrated in the email attached as Exhibit A, his counsel consented to the list of documents proposed to be included in the Record on Appeal. The undersigned counsel never contemplated that the exhibits to Mock's Verified Complaint, motions,

and responses to motions would not be included in the Record on Appeal because they were part of Mock's filings and expressly referenced therein. See, e.g., Rule 10(c), SCRCPC (asserting that copies of any documents included as "an exhibit to a pleading [are] a part thereof for all purposes only if a copy is attached to such pleading"). Likewise, counsel was never under the impression that these items required a separate designation in the list of proposed matter. Regardless, all of the requested items were before the circuit court and are relevant to the issues on appeal. Therefore, they should be included in the Record on Appeal.

For the reasons set forth above, Mock respectfully requests that the Court issue an Order requiring Samuels-Cooper to supplement the Record on Appeal to include the attached documents and serve all parties with a copy thereof. Samuels-Cooper cited no authority in support of the notion that Mock should be required to pay the costs of relevant matter she failed to include in the Record on Appeal. Thus, respectfully, her request should be denied.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

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Vordman Carlisle Traywick, III
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Post Office Box 11449
Columbia, South Carolina 29211
(803) 929-1400

Counsel for Respondent-Appellant Bucky Mock

October 3, 2018

Columbia, South Carolina

EXHIBIT A

Rob Tyson

From: Rob Tyson
Sent: Thursday, September 13, 2018 10:46 AM
To: K Hodge; Lisle Traywick; shaun@shaunkentlaw.com; hbrant@elections.sc.gov; eric@ctlawsc.com; joe@ctlawsc.com; phunter@scag.gov
Cc: Ronnie Sabb; Kimberly Barr; {F30304}.Clients@f8eed.imanage.work
Subject: RE: Bucky Mock vs. LaNette Samuels-Cooper, et. al

Morning, List looks fine to us. We thought it might be helpful to the Court for its review and the Table of Contents if we gave some additional language on # 20 a), b), and c). After the current language in a), we'd suggest adding the following "Bucky Mock". After b), "of LaNette Samuels-Cooper, March 19, 2018" and after c), "LaNette Samuels-Cooper, April 4, 2018". For example, 20 (b) would read as follows, " P-2 Filing Affidavit Of Coroner, LaNette Samuels-Cooper, March 19, 2018".

Also, can you please send a copy of Ex. D-4, "Copy of Qualification for Coroner"? I'm pretty sure I have it but need to confirm.

Given the weather and the potential loss of power, do y'all want to treat Monday as the day "the parties agree to the contents of the Record"? If so, the Final Briefs would be due in 5 days, or the following Monday September 24. Ok with y'all?

Also, can you send us a PDF version of the Record when you have it next week as early as you can so we can start plugging in page numbers to our citations?

I look forward to your thoughts.

Tks. Rob

Rob Tyson
Robinson Gray Stepp & Laffitte, LLC
803-231-7838

From: K Hodge [mailto:khodge@sabblaw.com]
Sent: Wednesday, September 12, 2018 12:05 PM
To: Rob Tyson <rtyson@robinsongray.com>; Lisle Traywick <ltraywick@robinsongray.com>; shaun@shaunkentlaw.com; hbrant@elections.sc.gov; eric@ctlawsc.com; joe@ctlawsc.com; phunter@scag.gov
Cc: Ronnie Sabb <ronniesabb@sabblaw.com>; Kimberly Barr <kbarr@sabblaw.com>
Subject: Bucky Mock vs. LaNette Samuels-Cooper, et. al

Dear All,

Please find enclosed our list of documents that we plan on using for our Record on Appeal for the above-referenced matter.

If anything further is needed, please do not hesitate contacting us.

With kind regards, I am

Very truly yours,

KIMBERLY M. HODGE, ESQUIRE
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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 which LaNette Samuels-Cooper is the Appellant.

PROOF OF SERVICE

I certify that I have caused the service of Respondent-Appellant's Reply in Support of Motion to Supplement the Record on Appeal on Appellant-Respondent and Defendants by U.S. Mail and electronic mail on October 3, 2018 to the attorneys of record at the following addresses:

Counsel Served: Ronnie A. Sabb, Esq.
 Kimberly V. Barr, Esq.
 Kimberly M. Hodge, Esq.
 Post Office Box 88
 Kingstree, South Carolina 29556
 Counsel for Appellant

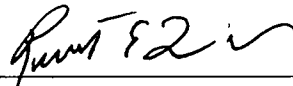
 Shaun Kent, Esq.
 Kent Law Firm
 19 Mill Street
 Manning, South Carolina 29102
 Counsel for Clarendon County Board of Voter Registration & Elections

J. Eric Cavanaugh, Esq.
Joseph Thickens, Esq.
Cavanaugh & Thickens
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***Counsel for South Carolina Democratic Party and
Clarendon Co. Democratic Party***

Harrison D. Brant, Esq.
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Post Office Box 11549
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Counsel for South Carolina State Election Commission

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Attorneys for Respondent Bucky Mock