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ATTORNEYS AND COUNSELORS AT LAW

October 3, 2018

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

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)

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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. SUPREME COURT

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

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

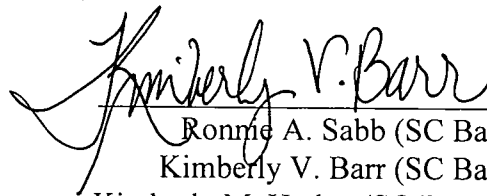
27, 2018 and August 13, 2018 hearings in this matter on September 11, 2018. Further, counsel downloaded the pleadings, motions and orders in this case from the Clarendon County public index, drafted a list of documents proposed to be included in the record on appeal and disseminated that list to all 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.



Ronnie A. Sabb (SC Bar No.: 9814)
Kimberly V. Barr (SC Bar No.: 8443)
Kimberly M. Hodge (SC Bar No.: 103450)
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October 3, 2018

Attorneys for Appellant-Respondent

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EXHIBIT A

Documents for Record on Appeal

RE: LaNette Samuels-Cooper

1. Summons and Complaint
2. Plaintiff's Motion for Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction
3. Order Granting Temporary Restraining Order dated 6/21/2018
4. Affidavit of Dennis Fowler with Attachments
5. Motion of Defendant LaNette Samuels-Cooper to Dismiss
6. Answer of Defendant LaNette Samuels-Cooper
7. Plaintiff's Opposition to Defendant LaNette Samuels-Cooper's Motion to Dismiss
8. Motion to Dismiss of Clarendon County Democratic Party and South Carolina Democratic Party
9. Memorandum of Defendant LaNette Samuels-Cooper in Support of Motion to Dismiss
10. Motion of Defendant Clarendon County Board of Voter Registration & Elections to Dismiss with Prejudice
11. Order of the Honorable R. Ferrell Cothran, Jr., dated 8/3/2018
12. Motion of Clarendon County Democratic Party and South Carolina Democratic Party to Reconsider and/or Amend Order
13. Motion of Defendant LaNette Samuels-Cooper to Reconsider or to Alter or Amend Judgment
14. Motion of Plaintiff to Alter or Amend Judgment
15. Response of Plaintiff in Opposition to Defendants' Motion to Alter or Amend Judgment
16. Amendment to Order of the Honorable R. Ferrell Cothran, Jr., Altering or Amending Judgment dated 8/13/2018
17. Notice of Appeal of LaNette Samuels-Cooper
18. Order of the Supreme Court of LaNette Samuels-Cooper
19. Respondent Bucky Mock's Notice of Appeal
20. Transcript of July 20, 2018 Proceedings
 - a. P-1 Filing Affidavit of Coroner, Bucky Mock, March 16, 2018
 - b. P-2 Filing Affidavit of Coroner, LaNette Samuels-Cooper, March 19, 2018
 - c. P-3 Filing Affidavit of Coroner, LaNette Samuels-Cooper, April 4, 2018
 - d. P-4 American Board Death Investigators
 - e. D-1 Clarendon County Data
 - f. D-2 February 21, 2012 Letter
21. Transcript of July 27, 2018 Proceedings
 - a. P-6 Letter SCDP to Black-Oliver 4/5/2018
 - b. D-3 Copy of Diploma – Johnson C. Smith University
 - c. D-4 Copy of Qualifications for Coroner
 - d. D-5 Confirmation of Registration – Saint Louis University
 - e. D-6 Letter SC Coroner's Association to Smith 2/12/2012
 - f. D-7 Letter SC Coroner's Association 4/2/2018
22. Transcript of August 13, 2018 Proceedings

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R. Ferrell Cothran, Jr., Circuit Court Judge

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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 3, 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)

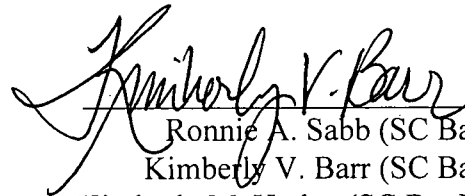
Joseph O. Thickens, Esquire
James Eric Cavanaugh, Esquire
1324 Gadsden Street
Columbia, South Carolina 29201
(Attorneys for Respondents Clarendon County Democratic Party and South Carolina Democratic Party)

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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