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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In the Court of Common Pleas for the Ninth Circuit

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2018-001158

RECEIVED
MAY 20 2019
SC Court of Appeals

Curtis Mills.....Respondent

v.

The South Carolina State Ports AuthorityAppellant

CONSENT MOTION FOR EXTENSION OF TIME (10 DAYS) TO AMEND DESIGNATION
OF MATTERS TO BE INCLUDED IN RECORD ON APPEAL AND FILE FINAL BRIEF

Ladson F. Howell, Jr., Esq.
HOWELL LAW GROUP, LLC
250 Mathis Ferry Road, Ste. 102
Mt. Pleasant, SC 29464
843-501-2011

Other Counsel of Record

Randolph R. Lowell, Esq.
WILLOUGHBY & HOEFER
151 Meeting St., Ste. 325 (28401)
P.O. Box 10
Charleston, SC 29402

Randell C. Stoney, Esq.
John W. Fletcher, Esq.
BARNWELL, WHALEY, PATTERSON &
HELMS, LLC
885 Island Park Drive (29492)P.O. Drawer H
Charleston, SC 29402

NOW COMES Respondent Curtis Mills and files the following Motion for Extension of Time to Amend Designation of Matters to be Included in Record on Appeal, and to Serve Final Brief:

1. In his Initial Brief, Respondent referenced Trial Transcript pages 203 and 212. However, these two pages were inadvertently omitted from Respondent's Designation of Matters to be included in the Record on Appeal.

Attached hereto as "Exhibit A" is Respondent's Amended Designation of Matters to be Included in the Record on Appeal. With the consent of all parties, Respondent respectfully requests an extension of 10 days to correct this error and file his Final Brief.

Respectfully submitted,

By: 

Ladson F. Howell, Jr., Esq.
HOWELL LAW GROUP, LLC
250 Mathis Ferry Road, Ste. 102
Mt. Pleasant, SC 29464
843-501-2011

May 17, 2019

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

**APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS**

**THE HONORABLE KRISTI LEA HARRINGTON,
CIRCUIT COURT JUDGE**

CIVIL ACTION NO. 2018-001158

Curtis Mills,

RESPONDENT,

versus

The South Carolina State Ports Authority,

APPELLANT.

**RESPONDENT'S AMENDED DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Ladson F. Howell, Jr.
HOWELL LAW GROUP, LLC
250 Mathis Ferry Road, Ste. 102
Mt. Pleasant, South Carolina 29464
(843) 849-2800

ATTORNEY FOR RESPONDENT



Other counsel of Record:

Randolph R. Lowell, Esq.
WILLOUGHBY & HOEFER, PA
133 Rivers Landing Drive, Ste. 200
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& HELMS, LLC
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P.O. Drawer H
Charleston, SC 29402
843-577-7700

**Counsel for Appellant South Carolina State
Ports Authority**

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondent, Curtis Mills hereby designates the following materials to be included in the Record on Appeal in this matter in connection with its Respondent's Brief. Unless otherwise expressly stated, each item designated is to include all attachments or exhibits to the original of the referenced item. Curtis Mills intends to designate each and every item from the record that it cited in its Initial Respondent's Brief in this matter. Curtis Mills expressly reserves the right to seek supplementation of the record pursuant to Rules 209 and 212, SCACR. Curtis Mills designates the following matters for inclusion in the Record on Appeal:

1. May 7, 2014 Summons and Complaint
6. May 29, 2018 - June 1, 2018 Trial Transcript (Pages 86, 104, 105, 106, 113-118, 147-148, 149, 169, 187, 203, 212, 213, 230, 173-174, 187, 434, 436, 483, 485-486, 490)
7. May 31, 2018 Transcript of Record Jury Charge
8. June 1, 2018 Form 4 and completed Verdict Form
10. June 8, 2018 Transcript of Post-Trial Motions in its entirety
11. June 8, 2018 Form 4 Order
13. Plaintiff's Proposed Jury Instructions
14. Pay stub of Damion Solomon.
15. Plaintiff's Post Trial Brief

The Respondent, Curtis Mills, certifies, pursuant to S.C.A.C.R. 209, that the designations set forth above are relevant to the appeal in this matter, and that it has not designated any matter that is irrelevant to the issues before the Court.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

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

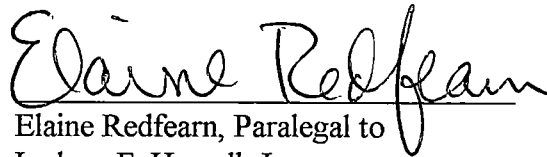
Ladson F. Howell, Jr.
HOWELL LAW GROUP, LLC
Post Office Box 1896 (29465)
250 Mathis Ferry Road, Ste. 102
Mt. Pleasant , South Carolina 29464

ATTORNEY FOR RESPONDENT

May 17, 2019

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Howell Law Group, LLC, attorney for Respondent, Curtis Mills, do hereby certify that I have served the foregoing Consent Motion for Extension of Time (10 days) to Amend Designation of Matters and to be included in the Record on Appeal File Respondent's Final Brief dated May 17, 2019, by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the parties indicated below:


Elaine Redfearn, Paralegal to
Ladson F. Howell, Jr.

May 17, 2019

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MAY 20 2019

SC Court of Appeals

HOWELL LAW GROUP, LLC

Accident Attorney
FIGHTING FOR THE INJURED

LADSON F. HOWELL, JR.
Certified Circuit Court Mediator
lad@hcinjury.com

P.O. Box 1896
Mount Pleasant, South Carolina 29465
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Facsimile: (843) 884-2007

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MAY 20 2019

SC Court of Appeals

May 17, 2019

VIA U.S. MAIL

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

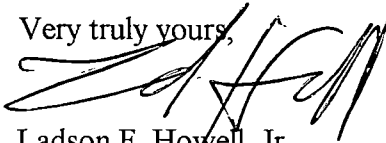
RE: Curtis Mills vs. SC State Port Authority
Case No.: 2018-001158

Dear Ms. Kitchings:

Please find enclosed Respondent's Consent Motion for Extension of Time (10 days) to Amend Designation of Matters to be included in Record on Appeal and File Respondent's Final Brief in the above referenced case. I have enclosed a check in the amount of \$50.00 for this requested extension of time.

If you should have any questions or need anything further, please do not hesitate to give me a call. With kind regards, I am,

Very truly yours,



Ladson F. Howell, Jr.
LFH/ser

cc: Randell C. Stoney, Jr., Esq.
Randolph R. Lowell, Esq.
John W. Fletcher, Esq.

Howell Law Group, LLC
250 Mathis Ferry Rd
Ste. 102
Mt. Pleasant, SC 29464

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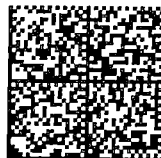
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