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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Eugene P. Warr, Jr., Special Referee

RECEIVED

MAR 16 2020

SC Court of Appeals

Case No. 2016-CP-21-00702
Appellate Case No. 2019-001062

Vincent C. Carter d/b/a Elite Construction

Respondent,

v.

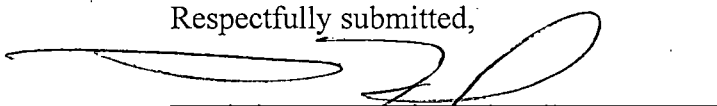
Eagles Landing Restaurants, LLC

Appellant.

MOTION TO AMEND INITIAL BRIEF OF RESPONDENT

Pursuant to Rule 240, SCACR, Respondent respectfully moves the Court to amend the Initial Brief of Respondent. The Respondent further requests that the Appellant's time to file and service its Reply brief be tolled pending the resolution of this motion.

Respectfully submitted,



March 31, 2020

Florence, South Carolina

PATRICK B. FORD
S.C. Bar No.: 102521
FINKLEA LAW FIRM
P.O. Box 1317
814 West Evans Street (29501)
Florence, SC 29503
Phone: (843) 317-4900
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E-mail: pford@finklealaw.com
Attorney for Respondent

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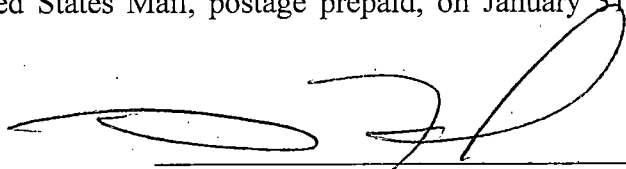
Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Motion to Amend Initial Brief of Respondent upon counsel for the Appellant, Brooks, R. Fudenberg, Esquire, at the Law Office of Brooks R. Fudenberg LLC, 171 Church Street, Suite 170 Charleston, SC 29401 by depositing a copy of it in the United States Mail, postage prepaid, on January 31, 2020.

March 13, 2020

Florence, South Carolina



PATRICK B. FORD
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Attorney for Respondent



FINKLEA LAW FIRM

ATTORNEYS AND COUNSELORS AT LAW

Gary I. Finklea
Charlie J. Blake, Jr.
J. Gregory Hendrick
Patrick B. Ford
J. O'Neill Edwards
Susan C. McGill
B. Hicks Harwell, Jr.
(1933-2012)

March 13, 2020

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Elite Construction Co. vs. Eagles Landing
Restaurants, LLC
Case No.: 2016-CP-21-00702
Appellate Case # 2019-001062
Our File No.: 15511.2PFVB

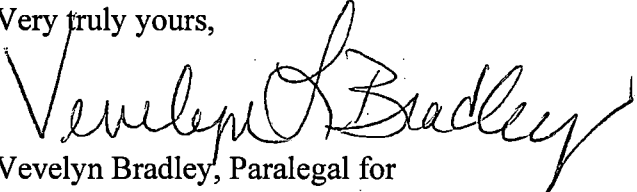
Dear Ms. Kitchings:

Enclosed for filing in the above matter are an original and six (6) copies of the Motion to Amend Initial Brief of Respondent, Proposed Amended Initial of Brief Respondent, Proof of Service, and a check in the amount of \$50.00 representing the filing fee. I would appreciate your office filing and returning the certified copies in the enclosed self-addressed stamped envelope.

By copy of this letter with enclosures to counsel for Appellant, Brooks R. Fudenberg, Esquire, I am serving opposing counsel with copies of the same.

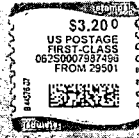
With kindest regards, I am

Very truly yours,


Vevelyn Bradley, Paralegal for
PATRICK FORD

PBF:vlb
Enclosures

Cc: Vince Carter (w/enclosures)
Brooks R. Fudenberg, Esquire (w/enclosures)



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FINKLEA LAW FIRM
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TO:
 Hon. Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 Post Office Box 11629
 Columbia, South Carolina 29211

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