

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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**APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas**

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**The Honorable Perry H. Gravely, Circuit Court Judge  
Trial Court Case No. 2016-CP-23-06314**

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**Appellate Case No. 2019--000190**

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**RECEIVED**

**APR 03 2020**

**SC Court of Appeals**

**Ascension Forensic, LLC,**

**Respondent,**

**v.**

**Patricia B. Clark,**

**Appellant.**

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**RESPONSE TO RESPONDENT'S MOTION TO SUPPLEMENT RECORD**

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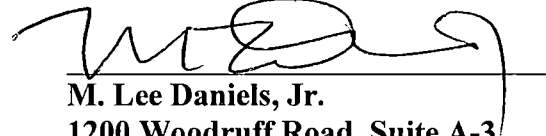
**M. Lee Daniels, Jr.  
M. LEE DANIELS, JR., P.C.  
1200 Woodruff Road, Suite A-3  
Greenville, South Carolina 29607  
(864) 242-9484  
[mld@wimlaw.com](mailto:mld@wimlaw.com)**

**Attorney for Appellant**

Respondent has moved to supplement the Record on Appeal in this case with a purported document (no copy was attached to the Motion) which was not introduced or proffered at the hearing on this matter before Judge Gravely. Therefore, it could not have had any effect on the decision reached by Judge Gravely which is being appealed. As such, this document is not a proper supplement to the Record on Appeal, which should contain only “documents from the transcript of proceedings or other matter which was before the lower court.” Rule 212(a) SCACR. As such, Appellee opposes the Motion to Supplement Record and requests that the motion be denied by this Court.

Respectfully submitted, this 1<sup>st</sup> day of April, 2020.

**M. LEE DANIELS, JR., P.C.**

A handwritten signature in black ink, appearing to read 'M. Lee Daniels, Jr.', is written over a horizontal line.

**M. Lee Daniels, Jr.  
1200 Woodruff Road, Suite A-3  
Greenville, South Carolina 29607  
(864) 242-9484  
[mld@wimlaw.com](mailto:mld@wimlaw.com)**

**Attorney for Appellant**

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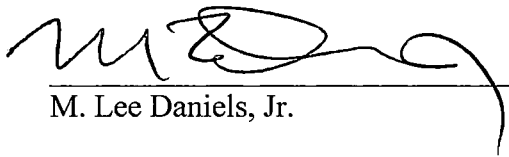
**PROOF OF SERVICE**

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I hereby certify that I have served the foregoing Response to Respondent's Motion to Supplement record in this case on counsel for Appellant by depositing a copy of same in the United States Mail, postage prepaid, properly addressed as follows:

K. Jay Anthony  
650 East Washington Street  
Greenville, South Carolina 29601

This the 1<sup>st</sup> day of April, 2020.

  
M. Lee Daniels, Jr.

**M. LEE DANIELS, JR., P.C.**  
**ATTORNEY AT LAW**  
**OF COUNSEL TO**  
**WIMBERLY LAWSON SCHNEIDER STECKEL & STINE, P.C.**

**1200 WOODRUFF ROAD, SUITE A-3**  
**GREENVILLE, SOUTH CAROLINA 29607**

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*(864) 242-9484*  
*OFFICE:*  
*(864) 213-2140*

April 1, 2020

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

**RECEIVED**  
**APR 03 2020**  
**SC Court of Appeals**

Re: Ascension Forensics, LLC v. Patricia B. Clark  
App. Case No. 2019-000190

Dear Ms. Kitchings:

Please find enclosed for filing purposes the original and six copies of Appellant Clark's Response to Respondent's Motion to Supplement Record, along with Proof of Service. An extra copy of these papers is enclosed. If not needed by the Court, please return them to us in the reply envelope enclosed with the file stamp affixed on them.

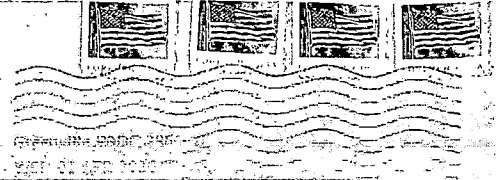
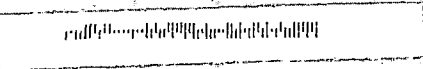
Thank you for your assistance in this matter.

Sincerely,

**M. LEE DANIELS, JR., P.C.**

  
M. Lee Daniels, Jr.

cc: K. Jay Anthony (w/enc.)



M. Lee Daniels, Jr., P.C.  
 1200 Wasshuff Blvd, Suite A-3  
 Greenville, South Carolina 29207

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

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 APR 03 2020  
 SC Court of Appeals