

IN THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM KERSHAW COUNTY

Court of Common Pleas

RECEIVED

Apr 13 2020

SC Court of Appeals

Honorable Robert E. Hood, Presiding Judge, Fifth Judicial Circuit

Appellate Case No. 2019-000624

Dottie R. Bell Appellant,

v.

John C. Bentley. Respondent.

CONSENT MOTION TO FILE SUPPLEMENTAL RECORD

Respondent hereby moves the Court for leave pursuant to Rule 212(b), SCACR, to file a supplement to the Record on Appeal. This Motion is being made with Appellant’s consent. The basis for the motion is that two documents designated by Respondent were omitted from the Record on Appeal.

Additionally, the Record on Appeal includes a number of exhibits that were submitted to the trial court with Appellant’s Motion to Reconsider. However, the motion itself and the corresponding order were not included in the Record. In an effort to provide the Court context for the exhibits, Respondent, with Appellant’s consent, requests the supplementation of the Record on Appeal to include the Motion to Reconsider and the Order denying the motion.

The Appendix is attached so that it may be conditionally filed with the motion. The Appendix contains the omitted designated documents as well as the Motion to Reconsider and the trial court's Order denying the same.

April 13, 2020

Respectfully submitted,

s/Sarah Rand-McDaniel

S.C. Bar No.: 101340

Seth McDaniel

S.C. Bar No.: 100689

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ATTORNEYS FOR RESPONDENT

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PROOF OF SERVICE

The undersigned attorney hereby certifies that a true copy of Consent Motion to Supplement the Record has been served upon opposing counsel by e-mailing a copy to the e-mail addresses provided in the Attorney Information System (pursuant to the South Carolina Supreme Court Order dated March 20, 2020) this 13th day of April, 2020.

T. Jeff Goodwyn, Jr., Esquire
David Beale, Esquire
Goodwyn Law Firm, LLC
jgoodwyn@goodwynlaw.com
dbeale@goodwynlaw.com

s/Sarah Rand-McDaniel
Attorney for Respondent

April 13, 2020

From: [Sarah McDaniel](#)
To: ["C. David Beale, Jr."](#); jgoodwyn@goodwynlaw.com
Cc: [Seth McDaniel](#); [Heather Hood](#); ["Mary Bush"](#)
Subject: RE: Bell v. Bentley appeal
Date: Monday, April 13, 2020 11:48:00 AM
Attachments: [Consent Motion to Supplement Record and Proof of Service.pdf](#)
[Appendix.pdf](#)

David and Jeff,

Attached for service upon your client are the **Consent Motion to Supplement the Record on Appeal** and the **Appendix** dated April 13, 2020 for filing in **Appellate Case No. 2019-000624 entitled Dottie R. Bell v. John C. Bentley**. Pursuant to the Supreme Court Order regarding Appellate Court Operations during the Covid-19 Crisis dated March 20, 2020, I will attach this email to the Proof of Service for each filing. All documents are being filed via the South Carolina Judicial Branch online filing portal utilizing OneDrive for Business as directed by the Supreme Court's April 9, 2020 announcement.

Should you have any questions or concerns, please do not hesitate to contact me.

Regards,

Sarah Rand-McDaniel
Attorney at Law



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COVID-19 Statement. Some of our lawyers and staff are working remotely during the current time. Although phones and voicemail are operational, please reach out to us via email, if possible, and do not rely on phone contact, especially for more important or urgent matters. We are currently still sending and processing incoming mail; however, use of digital documentation and links for downloading larger documents is preferable to the extent possible to promote efficiency and allow quicker responses. Thanks, and take care.

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compose new encrypted emails to our firm. If you have questions, please call our office. Thank you.
