

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2019-001599

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL DESIGNATION OF
MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL**

Ransome H. Helmly, SC Bar # 78081
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Attorney for Appellant

RECEIVED
Jun 10 2020
SC Court of Appeals

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS:

COMES NOW the Appellant, Karyn Cavanaugh, by and through her undersigned counsel, and hereby respectfully requests that this Honorable Court grant her leave to file the attached Supplemental Designation of Matter to be Included in the Record on Appeal and to cite thereto in her Record on Appeal, which is provisionally filed contemporaneously herewith.

The attached Supplemental Designation of Matter to be Included in the Record on Appeal includes only the following matter: **Magistrate Appeal Brief dated July 29, 2019**. Through inadvertence, counsel for Appellant did not include this matter in the original Designation of Matter which was filed on January 27, 2020 despite having cited to it in her Initial Brief.

The Appellant submits that there is good cause to grant the present motion, such motion being consistent with the interests of justice and not unduly prejudicial to any party.

WHEREFORE, the Appellant respectfully requests that the proposed Supplemental Designation of Matters to be Included in the Record on Appeal, which is being filed electronically herewith (with a copy served on the Respondent), be accepted as filed along with the Record on Appeal, which cites thereto, and which is provisionally filed contemporaneously herewith.

Respectfully submitted,

s/Ransome H. Helmly

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Email: rh@helmylaw.com
Attorney for Appellant

Mt. Pleasant, South Carolina

Dated: June 10, 2020

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907

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SC Court of Appeals

New Age Contractors, LLP,

Respondent,

v.

Karyn Cavanaugh,

Appellant.

PROOF OF SERVICE

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Attorney for Appellant

I, Elizabeth R. O'Neil, on behalf of Appellant, hereby certify that a copy of

the *Motion for Leave to File Supplemental Designation of Matters to be Included in the Record on Appeal* was sent via electronic mail to all counsel of record on June 10, 2020 addressed as follows:

William K. Kalivas, Esquire

Email: wkalivas@scnlaw.com

s/Elizabeth R. O'Neil

Paralegal to Ransome H. Helmly

Mt. Pleasant, South Carolina

Dated: June 10, 2020

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June 10, 2020

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SC Court of Appeals

Via Email (sritchie@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
Sierra Ritchie, Case Management Specialist
Post Office Box 11629
Columbia, South Carolina 29211

RE: Karyn Kavanaugh, Appellant v. New Age Contractors, LLP, Respondent
Case No. 2019-001599

Dear Ms. Kitchings and Ms. Ritchie:

Appellant will not be filing a Reply Brief in connection with the above matter. In lieu of a Reply Brief, enclosed for filing please find the following:

- Appellant's Motion to File Supplemental Designation of Matters to be Included in the Record on Appeal;
- Proof of Service concerning same;
- Record on Appeal; and
- Proof of Service concerning same.

Our firm check in the amount of \$50.00 to cover the cost of filing the Motion to File Supplemental Designation of Matters to be Included in the Record on Appeal will be mailed directly to the Court of Appeals today.

Kindly return one clocked copy of each filing to us via email, or whichever matter is most convenient to you at this time. Thank you, in advance, for your assistance with this matter.

With kindest regards, I am

Sincerely,

s/Ransome H.Helmly

Ransome H. Helmly
Attorney for Appellant

cc: William Kalivas, Esq. (via email)