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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

The Honorable Donald B. Hocker

Appellate Case No. 2019-001514
Civil Action No. 2015CP3000624

RECEIVED
JUL 24 2020
SC Court of Appeals

Martha Foster Watts, Appellant

v.

Ricky W. Chastain, Sheriff Laurens County,
South Carolina, Respondent.

**MOTION TO AMEND RESPONDENT'S
INITIAL BRIEF**

The respondent, consistent with Appellate Court Rule 240, respectfully moves for an order permitting the Respondent to amend two deposition references on Page 6 of Respondents' Brief, which were included in Initial Brief by oversight. The deposition references were not published at trial. The Respondent therefore moves to amend its Initial Brief to omit those deposition references which were included by oversight and to insert and quote page 30 L8 through Page 30 L 23 of the transcript from the video deposition that was played at trial and that is part of

the Designation of Matter. This amendment in no way results in prejudice to the Appellant.

Respectfully submitted,

s/ Russell W. Harter, Jr.
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Attorneys for Respondent

July 21, 2020

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

The Honorable Donald B. Hocker, Circuit Court Judge

Appellate Case Number: 2019-001514

Martha Foster Watts, Appellant,

v.

Ricky W. Chastain, Sheriff
Laurens County, South Carolina..... Respondent

PROOF OF SERVICE

I certify that I have served the Respondent's Motion to Amend Respondent's Initial Brief and Memorandum in Support of Respondent's Motion to Amend by depositing a copy of same in the United States Mail, postage prepaid, on July 21, 2020, addressed to the attorneys of record, as indicated below.

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Townsend & Thompson
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Post Office Box 215
Laurens, South Carolina 29360

s/ Russell W. Harter, Jr.
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July 21, 2020

Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
Post Office Box 11620
Columbia, SC 29211

RE: *Martha Foster Watts v. Ricky W. Chastain, Sheriff, Laurens County South
Carolina*
Appellate Case No.: 2019-001514
Lower Court Civil Action Number: 2015-CP-30-00624
SCAC Claim Number: EV2013005339

Dear Madam Clerk:

With regard to the above matter, please find enclosed herewith Motion to Amend Respondent's Initial Brief along with Memorandum in Support of Motion to Amend Respondent's Initial Brief along with filing fee of \$50.00. Also enclosed is our Proof of Service upon Appellant's counsel.

Warmest regards.

Yours very truly,
CHAPMAN, HARTER & HARTER, P.A.

A handwritten signature in black ink, appearing to read "Russell W. Harter, Jr.".

Russell W. Harter, Jr.

/pfs
Enclosures

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