

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM FLORENCE COUNTY

Thomas A. Russo, Circuit Court Judge

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Appellate Case No.: 2019-000102

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**RECEIVED**  
**Jul 29 2020**  
**SC Court of Appeals**

Jim Stroud,

Respondent,

v.

Demetric Hayes and Carla Marshall,

Appellants.

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**MEMORANDUM IN SUPPORT OF MOTION  
SUPPLEMENT THE RECORD ON APPEAL**

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This matter arises upon Respondent, Jim Stroud's, Motion to Supplement the Record on Appeal. In addition to this Memorandum, Respondent relies on the Respondent's Designation of Matter to be Included in the Record on Appeal, and the Record on Appeal submitted to the Court.

**BACKGROUND**

The Appellants initiated this Appeal on January 22, 2019, upon filing the Notice of Appeal with the Circuit Court. The Respondent served his Designation of Matter to be Included on the Record of Appeal ("Respondent's Designation") on March 11, 2020. The Respondent's Designation contained the Application of Ejectment. (Respondent's

Designation of Matter to be Included on Appeal. The Appellants served the Record on Appeal on July 6, 2020. However, the Record on Appeal is void of the Application of Ejection.

### ARGUMENT

The Record on Appeal must include all matter designated to be included by any party under Rule 209. Rule 210(c), SCACR. The Respondent's Designation contained the Application of Ejection. (Respondent's Designation of Matter to be Included on Appeal). Rule 212(b) permits a party to supplement the Record on Appeal at any time before argument commences. Based upon the foregoing, this Court should permit the Respondent to supplement the Record on Appeal.

The Respondent further requests an extension of time to serve his Final Brief (or alternative to serve and file his Final Brief out of time) so as to include the Record on Appeal, as supplemented, should this Court grant the Respondent's Motion.

July 29, 2020

Florence, South Carolina

Respectfully submitted,

S/Patrick B. Ford

**PATRICK B. FORD**

S.C. Bar No.: 102521

**FINKLEA LAW FIRM**

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**Attorney for Respondent**

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PROOF OF SERVICE  
\_\_\_\_\_

I certify that I have served the Initial Brief of Respondent and the Respondent's Designation of Matter to be Included in the Record on Appeal on the Appellants, Demetric Hayes and Carla Marshall, by depositing a copy of each in the United States Mail, postage prepaid, on today's date, addressed to Demetric Hayes, P.O. Box 2572, West Columbia, South Carolina 29171 and Carla Marshall P.O. Box 2572, West Columbia, South Carolina 29171.

July 29, 2020

S/Patrick B. Ford  
Patrick B. Ford, Esquire



**FINKLEA, HENDRICK & BLAKE, LLC**  
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)

July 30, 2020

South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: ~~Jim Stroud adv. Demetric Hayes and Carla Marshall~~  
C/A#: 2019-000102  
Our File No.: 10194.41PFHT

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JUL 31 2020

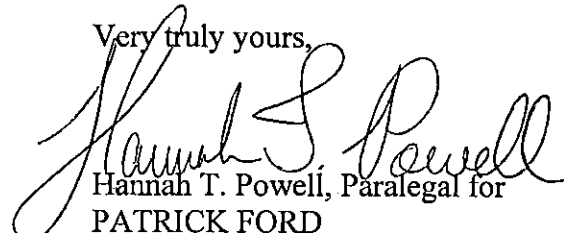
SC Court of Appeals

Dear Sir or Madam:

Enclosed is a firm check in the amount of \$50.00 representing the filing fee for the Motion to Supplement Record on Appeal and for Extension of Time to Serve Final Brief, Memorandum on Support of Motion to Supplement the Record on Appeal, and Proof of Service. Thank you for your assistance with this matter.

With kindest regards, I am

Very truly yours,

  
Hannah T. Powell, Paralegal for  
PATRICK FORD  
hpowell@finklealaw.com

PBF:htp  
Enclosures  
cc: Defendants, Carla Marshall and Demetric Hayes

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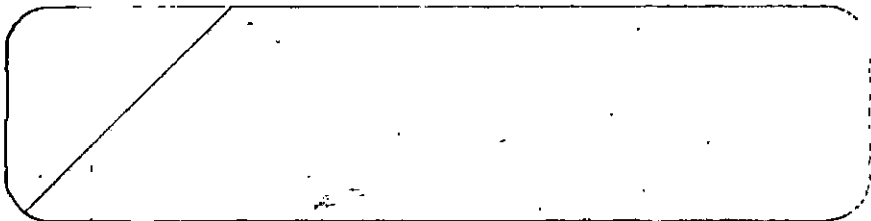
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SC Court of Appeals



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