

**MOTION TO FILE APPELANTS JOANNE AHEARN AND ROBERT J. PLUM'S  
SUPPLEMENTAL DESIGNATION OF MATTER RELEVANT TO  
SOUTH CAROLINA COURT OF APPEALS CASE NO. 2019-001886  
TO BE ADDED TO THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals  
[ In The Supreme Court]

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APPEAL FROM COLLETON COUNTY  
Court of Common Pleas

Kenneth A. Campbell Jr., Special Referee

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Appellate Case No. 2019-001886

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**RECEIVED**

NOV 13 2020

SC Court of Appeals

Patricia E. Campbell

Respondent

V.

Joanne Ahearn And Robert J. Plum

Appellant

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**MOTION TO FILE APPELANTS JOANNE AHEARN AND ROBERT J. PLUM'S  
SUPPLEMENTAL DESIGNATION OF MATTER RELEVANT TO**

**SOUTH CAROLINA COURT OF APPEALS CASE NO. 2019-001886 TO BE  
ADDED TO THE RECORD ON APPEAL**

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In response to Respondent Patricia E. Campbell's initial brief dated October 22, 2020, the Respondent stated there was no evidence provided by the Appellants Joanne Ahearn and Robert J. Plum supporting their claim in their Initial Brief of any text messaging prior to the action taken by the Respondent Patricia E. Campbell. The Appellants Joanne Ahearn and Robert J. Plum wish to produce voice mails made from Respondent Patricia E. Campbell to Appellant Joanne's cell phone number 843-603-0566, dated February 18, 2019, March 23, 2019 and October 28, 2019, prior to the complaint and action taken by Respondent Patricia E. Campbell and prior to the final judgement of Special Referee Kenneth A. Campbell which resulted in the removal of Appellants Joanne Ahearn and Robert J. Plum from the Respondents deeded property. These voice mails are relevant to the South Carolina Court of Appeals Case No. 2019-001886 and will be introduced as Exhibit 11. The Appellants Joanne Ahearn and Robert J. Plum also wish this Motion to be entered into the Record on Appeal.

November 9, 2020

Joanne Ahearn

504 Forest Circle, Apt. 123

Walterboro, SC., 29488

(843) 603-0566

Pro See

Robert J. Plum

504 Forest Circle, Apt. 123

(386) 416-9561

Pro See

 Joanne Ahearn 11/9/2020

Joanne Ahearn

Date

 Robert J. Plum 11/9/2020

Robert J. Plum

Date

**PROOF OF SERVICE TO REQUEST TO FILE MOTION  
FOR APPELLANT'S JOANNE AHEARN AND  
ROBRT J. PLUM TO INCLUDE SUPPLEMATION OF MATTER  
RELEVANT TO SOUTH CAROLINA COURT OF APPEALS CASE NO. 2019-001886  
TO BE ADDED TO THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

[ In The Supreme Court ]

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APPEAL FROM COLLETON COUNTY  
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Appellate Case No. 2019-001886

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Joanne Ahearn and Robert J. Plum

Appellants

V.

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**SC Court of Appeals**

**PROOF OF SERVICE TO REQUEST TO FILE MOTION  
FOR APPELLANTS JOANNE AHEARN AND ROBERT J. PLUM  
TO INCLUDE SUPPLEMENTATION OF DESIGNATION OF MATTER  
RELEVANT TO SOUTH CAROLINA COURT OF APPEALS  
CASE NO. 2019-001886 TO BE ADDED TO THE RECORD ON APPEAL**

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I certify that I Robert J. Plum have served a copy of Motion requesting Joanne Ahearn and Robert J. Plum to include supplementation of Designation of Matter relevant to South Carolina Court of Appeals Case No. 2019-001886 to be added to the Record on Appeal to the Respondent's attorney of record, Benjamin Cullifer Pickens Sapp located at 125 South Jefferies Blvd., Walterboro, South Carolina, 29488, via United States Postal Service on November 9, 2020

November 9, 2020

Joanne Ahearn  
504 Forest Circle Apt. 123  
Walterboro, SC. 29488  
(843) 603-5066  
Pro See

Robert J. Plum  
504 Forest Circle Apt. 123  
Walterboro, SC. 29488  
(386) 416-9561  
Pro See

Joanne Ahearn 11/9/2020

Joanne Ahearn Date

Robert J. Plum 11/9/2020

Robert J. Plum Date

ROBERT J. FLUM  
JOANNE ALDERIN  
408 OLD MISSION RD  
NEW SYMRA BEACH FL 32168



SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE STREET  
COLUMBIA, SC 29201

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