

RECEIVED

Jan 04 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Case No. 2017-CP-10-00838
Appellate Case No. 2020-001210

Jacque Lucas, Shirley Ann Lucas,
and Daniel Simerly,

Appellants,

v.

KapStone Paper and Packaging
Corporation, KapStone Kraft Paper
Corporation, Safway Group Holdings,
LLC, Easy Way Insulation Co., Sypris
Technologies Inc., Thompson Construction
Group, Inc., and Thompson Industrial
Services, LLC, Defendants,

Defendants,

Of which

KapStone Paper and Packaging
Corporation and KapStone Kraft Paper
Corporation are

Respondents.

**RESPONDENTS' MOTION TO FILE
AMENDED RESPONDENTS' INITIAL BRIEF**

Respondents seek an Order of this Court, pursuant to Rule 240, SCACR, permitting the Respondents to file the enclosed Respondents' Amended Initial Brief in the above-captioned appeal.

Respondents' Initial Brief was due January 4, 2021. Respondents timely filed their Initial Brief on December 30, 2020. After filing, Respondents discovered that their Initial Brief contained a computer-generated formatting error in the Table of Authorities. The formatting error did not affect the substance of Respondents' Initial Brief, nor did it affect the substance of the Table of Authorities, but it improperly labeled and organized the authorities cited in the Initial Brief. The Respondents, with consent of the Appellants, seek leave of the Court to file an Amended Initial Brief to fix the formatting error. This Motion is not made for the purpose of undue delay or any other improper purpose.

THEREFORE, the Respondents request an Order permitting the Respondents to file an Amended Initial Brief to remedy to formatting error contained in the Table of Authorities. The undersigned counsel for Respondents has consulted with counsel for Appellants, and Appellants consent to this Motion.

Respectfully submitted,

BOWMAN AND BROOKE LLP

By: s/ Richard H. Willis
Richard H. Willis
S.C. Bar No. 6159
Richard.Willis@bowmanandbrooke.com
Derek D. Tarver
S.C. Bar No. 103289
Derek.Tarver@bowmanandbrooke.com
1441 Main Street, Suite 1200
Columbia, SC 29201
Tel.: 803-726-7420
Fax: 803-726-7421

**Attorneys for Respondents KapStone Paper and
Packaging Corporation and KapStone
Kraft Paper Corporation**

January 4, 2021

Columbia, South Carolina