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Jul 22 2021
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BARNWELL COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge
Clifton B. Newman, Circuit Court Judge

Lower Court Case No. 2013-CP-06-00059
Appellate Case No. 2019-000599

Lorena Robinson, Elaine Nix, Archie Patterson,
and Tami Bollerman, Plaintiffs,

Of Whom Archie Patterson and Tami Bollerman are the Respondents,

v.

South Carolina Department of Employment and
Workforce Appellant.

**APPELLANT’S CONSENT MOTION FOR LEAVE TO FILE AMENDED
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, Appellant South Carolina Department of Employment and Workforce, by and through the undersigned counsel, submits this consent motion for leave to file the enclosed Consent Amended Designation of Matter to be included in the Record on Appeal. The purpose of the amendment is to accurately reflect the dates on which Document Nos. 7, 11, 20, 26, 27, and 72—all of which were previously designated—were filed in circuit court. Further, the amended designation clarifies that it is intended to include all attachments and exhibits to the designated item, unless they are duplicative of matters designated elsewhere on the list.

Appellant served Respondents with the Record on Appeal on July 20, 2021. This motion therefore will not delay resolution of the case. Rather, it is simply designed to prevent any confusion as to which documents are being referenced and when they were filed. Appellant has not added or replaced any documents identified in the original designation of matter. Counsel for Respondents Archie Patterson and Tami Bollerman consents to this request. Accordingly, for good cause shown, Appellant respectfully requests that the Court grant this consent motion and accept Appellant's Consent Amended Designation of Matter as filed.

Respectfully submitted,

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*Counsel for Appellant South Carolina Department of
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Columbia, South Carolina
July 22, 2021

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BARNWELL COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge
Clifton B. Newman, Circuit Court Judge

Lower Court Case No. 2013-CP-06-0059
Appellate Case No. 2019-000599

Lorena Robinson, Elaine Nix, Archie Patterson,
and Tami Bollerman, Plaintiffs,

Of Whom Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and
Workforce Appellant/Respondent.

PROOF OF SERVICE

I certify that I have served the Consent Motion for Leave to File an Amended Designation of Matter to be Included in the Record on Appeal on the following counsel of record by email on July 22, 2021.

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Columbia, South Carolina
July 22, 2021

Lisle Traywick

From: Lisle Traywick
Sent: Thursday, July 22, 2021 8:18 AM
To: dan@danwilliamslaw.com; Brad Hutto; 'Alexander Paterra'; Adam Protheroe; SBerk@scjustice.org
Cc: William H. Davidson II; Kenneth Woodington; Bobby Stepp; Rob Tyson; Robin Owens; {F327398}.Clients@f8eed.imanage.work
Subject: Patterson v. SCDEW (App. No. 2019-000599) Consent Motion for Leave to Filed Amended Designation of Matter [IMAN-CLIENTS.FID327398]
Attachments: Patterson v. SCDEW (App. No. 2019-000599) Consent Motion for Leave to File Amended Designation of Matter(37572128.1).pdf; Patterson v. SCDEW (App. No. 2019-000599) Appellant's Consent Amended Designation of Matter(37572129.1).pdf; Patterson v. SCDEW (App. No. 2019-000599) Proof of Service for Consent Motion for Leave to File Amended Designation of Matter(37572131.1).pdf

All,

Pursuant to In re Operation of the Appellate Courts During the Coronavirus Emergency, App. No. 2020-000447, Am. Order No. 2020-05-29-02, ¶ (g)(3) (S.C. Sup. Ct. filed May 29, 2020), attached for service upon you is Appellant SCDEW's Consent Motion for Leave to File an Amended Designation of Matter to be Included in the Record on Appeal, as well as the Consent Amended Designation of Matter and a Proof of Service, being filed in the Court of Appeals this morning.

Should you have any questions or concerns, please don't hesitate to contact us. Thanks and have a great day.

Best,

Lisle



VORDMAN CARLISLE TRAYWICK, III ASSOCIATE

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