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**Dec 06 2021**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
APPELLATE CASE NO. 2020-000021

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APPEAL FROM LANCASTER COUNTY  
Brian M. Gibbons, Circuit Court Judge  
Appellate Case No. 2014-CP-29-00306

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Desa Ballard, as Personal Representative of  
the Estate of Chris Combis,

Respondent,

v.

George Combis, Diane Combis, and Chris Combis,

Defendants,

Of whom

George Combis and Chris Combis are,

Appellants.

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**MOTION TO SUPPLEMENT  
RECORD ON APPEAL**

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Pursuant to Rule 212(b) SCACR. Respondent Ballard hereby moves this Honorable Court to allow a supplement of the Record on Appeal so that the full content of the Order of the Fourth Circuit Court of Appeals may be included rather than the first 9 of 15 pages which were originally included.

By Exhibit A, all opposing Counsel consent to this motion.

Respectfully Submitted

Truslow & Truslow Law Firm

s/Douglas N. Truslow

DOUGLAS N. TRUSLOW

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December 6, 2021

**From:** [Brian S. McCoy](#)  
**To:** [Ty McTier](#); [Mara Ballard](#); [Joe Pellington](#)  
**Cc:** [Desa Ballard](#)  
**Subject:** Re: Combis Estate Appeal  
**Date:** Friday, May 14, 2021 12:06:22 PM

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Me neither.

Thank you.

Brian S. McCoy  
McCOY LAW FIRM, LLC  
378 E. Main St.  
Rock Hill, SC 29730  
TEL (803) 366-2280  
FAX (803) 366-0643

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**From:** Ty McTier <tmctier@reddingjones.com>  
**Sent:** Friday, May 14, 2021 12:00 PM  
**To:** Mara Ballard <Mara@desaballard.com>; Brian S. McCoy <bmccoy@mccoylawfirm.com>; Joe Pellington <jpellington@reddingjones.com>  
**Cc:** Desa Ballard <desab@desaballard.com>  
**Subject:** Re: Combis Estate Appeal

Mara,

Hey good afternoon. No objections from me.

---

**Ty K. McTier, Associate**

2907 Providence Road, Suite 303

Charlotte, North Carolina 28211

Telephone | 704-900-2215 x113

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**From:** Mara Ballard <Mara@desaballard.com>

**Sent:** Wednesday, May 12, 2021 11:12 AM

**To:** Brian S. McCoy, Esquire <bmcocoy@mccoylawfirm.com>; Ty McTier <tmctier@reddingjones.com>; Joe Pellington <jpellington@reddingjones.com>

**Cc:** Desa Ballard <desab@desaballard.com>; Mara Ballard <Mara@desaballard.com>

**Subject:** Combis Estate Appeal

Good Morning,

I was checking C-Track this morning and noted you had not yet filed the supplemental Record on Appeal that we had previously discussed to include the entirety of the 4<sup>th</sup> Circuit Court of Appeals Order (attached). I'm sure this has just been an oversight due to busy schedules. Would you agree for me to prepare and submit the supplement (see SCACR Rule 212(b) which allows either party to file)?

Thank you in advance for your time and attention to this matter. I look forward to hearing from you.

With kindest regards,

Mara T. Ballard, CMA, CFE  
Forensic Accountant (not a lawyer)  
Ballard & Watson, Attorneys at Law  
226 State Street  
West Columbia, South Carolina 29169  
803.796.9299  
803.796.1066 Facsimile  
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Please note updated address. We are in the process of closing our old PO Box and are receiving all mail now at our street address.

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**Dec 06 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2020-000021

In the Matter of the Estate of Chris Combis,

Desa Ballard, as Personal Representative of the Estate of Chris Combis,  
Respondent

v.

George Combis, Diane Combis, and Chris Combis,  
Defendants,

Of Whom, George Combis and Chris Combis are the  
Appellants,

PROOF OF SERVICE

I, Mackenzie Woodward, Paralegal, certify that a true and correct copy of the forgoing document(s) was served upon all parties of record listed below by e-mail listed on the Attorney Information System pursuant to South Carolina Court of Appeals Order No. 2020-000447(e):

Brian S. McCoy, Esquire  
McCoy Law Firm, LLC  
378 E. Main Street  
Rock Hill, SC 29730  
bmccoy@mccoylelawfirm.com

Ty K. McTier, Esquire  
Redding Jones, PLLC  
2907 Providence Road, Suite 303  
Charlotte, NC 28211  
tmctier@reddingjones.com

DOCUMENT(S): 1. MOTION TO SUPPLEMENT RECORD ON APPEAL

*Mackenzie Woodward*

Mackenzie Woodward

Paralegal

Truslow & Truslow Law Firm

December 6, 2021

Columbia, South Carolina

# Truslow & Truslow

Attorneys At Law

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**Dec 06 2021**

**SC Court of Appeals**

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Columbia, SC 29202

December 6, 2021

Re: Estate of Chris Combis  
Appellate Case #2020-000021

**VIA E-MAIL ctappfilings@sccourts.org**

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Dear Ms. Kitchings:

Please find attached for filing a Motion to Supplement Record on Appeal and Proofs of Service for the above referenced matters.

Check #11916 for the Motion Fee is being mailed today.

If you should have any questions, please do not hesitate to contact us directly.

Respectfully,

*Mackenzie Woodward*

Mackenzie Woodward  
Paralegal to Truslow and Truslow

cc: Ty K. McTier, Esquire  
Brian S. McCoy, Esquire