

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

68178

APPEAL FROM DORCHESTER COUNTY
Master-in-Equity

Maite Murphy, Master-in-Equity

Case No.: 2009-CP-18-3315

LARRY E. KINARD,.....Appellant,

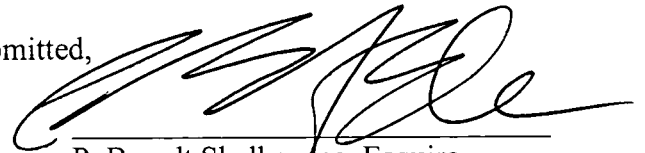
vs.

DOUGLAS S. RICHARDSON AND JULIE D. RICHARDSON,..... Respondents.

MOTION TO AMEND RESPONDENTS' INITIAL BRIEF

Respondents Douglas S. Richardson and Julie D. Richardson hereby petition the Court for an Order allowing Respondents to amend their Initial Brief to move the "Issues" stated in Respondents' table of contents to the body of Respondents' brief. The Statement of Issues on Appeal were listed as part of the Table of Contents in Respondents' Initial Brief and Respondents believe it would be more appropriate to have them set forth in the body of the brief. Respondents have requested Appellant's consent to this correction, but have received no response from Appellant's counsel.

Respectfully Submitted,



P. Brandt Shelbourne, Esquire
131 E. Richardson Ave.
Summerville, SC 29483
(843) 871-2210
SC Bar # 15143

RECEIVED

APR 25 2013

ATTORNEY FOR THE RESPONDENTS

April 23, 2013

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Master-in-Equity

Maite Murphy, Master-in-Equity

Case No.: 2009-CP-18-3315

LARRY E. KINARD,.....Appellant,

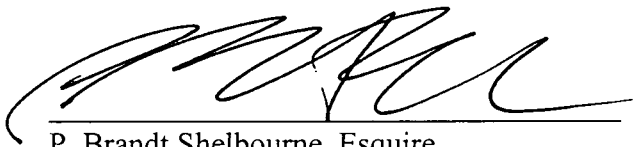
vs.

DOUGLAS S. RICHARDSON AND JULIE D. RICHARDSON,.....Respondents.

PROOF OF SERVICE

I certify that I have served a copy of the Respondents' Motion to Amend Respondents' Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, on April 23, 2013 addressed to the following:

John R. Polito, Esquire
106 Aldrich Place
Goose Creek, SC 29445



P. Brandt Shelbourne, Esquire
131 E. Richardson Ave.
Summerville, SC 29483
(843) 871-2210
SC Bar # 15143

April 23 2013
Summerville, South Carolina

ATTORNEY FOR RESPONDENTS

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SC Court of Appeals

SHELBOURNE LAW FIRM
Attorney and Counselor at Law
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P. Brandt Shelbourne

Phone (843) 871-2210

Fax (843) 875-2224

April 23, 2013

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

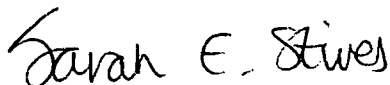
Re: Larry E. Kinard vs. Douglas Richardson, et al.
Case No.: 2009-CP-18-3315
Appellate Case No.: 2013-162
Our File No.: 3938-001

Dear Madam Clerk:

Enclosed please find an original and six (6) copies of the Respondents' Motion to Amend Respondents' Initial Brief and a Proof of Service along with our office check in the amount of \$25.00. Please file same and return a copy in the self-addressed stamped envelope provided. Thank you for your assistance in this matter.

With best regards, I am

Sincerely yours



Sarah E. Stives
Paralegal to P. Brandt Shelbourne

/ses

Enclosures

cc: Client
John R. Polito, Esquire

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APR 25 2013
SC Court of Appeals

SHELBOURNE LAW FIRM
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April 26, 2013

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

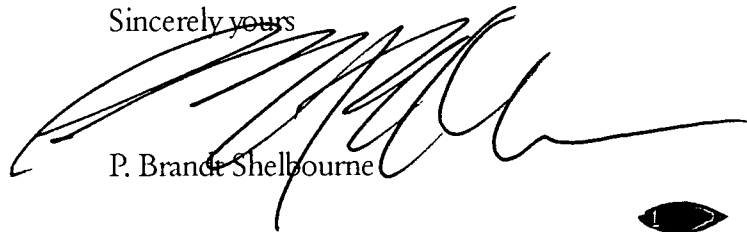
Re: Larry E. Kinard vs. Douglas Richardson, et al.
Case No.: 2009-CP-18-3315
Appellate Case No.: 2013-162
Our File No.: 3938-001

Dear Ms. Kitchings:

I have spoken to Attorney Polito and he consents to Respondents' Motion to Amend Respondents' Initial Brief. Please let me know if you need anything further from me. Thank you for your assistance.

With best regards, I am

Sincerely yours



P. Brandt Shelbourne

/ses

cc: Client
John R. Polito, Esquire

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APR 29 2013
SC COURT OF APPEALS