

95517

RECEIVED

FEB 03 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master-In-Equity

Joseph M. Strickland, Master-In-Equity Judge

Case No. 2009-CP-40-03264
Appellate Case No. 2021-000576

The unnamed Joint Venture of
Craig B. Stoneburner and Gary Appellant,
McLaurin with Respect to
Property Located at 301 South
Edisto Avenue, by and through
Craig B. Stoneburner, its
managing Venturer,

v.

George Anthony Moluf, III, Respondents.
James Whittington Clement, and
James Venable Revercomb, III,

RESPONDENT'S MOTION TO
SUPPLEMENT THE RESPONDENT'S INITIAL
DESIGNATION AND THE RECORD ON APPEAL

Pursuant to Rule 212(b), SCAR, Respondents respectfully move to supplement the Respondents' Initial Designation of Record and the Record on Appeal. Counsel for the Respondents noticed, when preparing the Final Brief on Appeal, that there was one page missing from the Record on Appeal and the Respondent's Initial Designation. A phone conference followed by written communication with Appellant's counsel resulted in an agreement to allow the Respondents to supplement the Initial Designation and the Record on Appeal. That written

communication and consent is attached to this Motion. The Respondents are prepared to Supplement both the Initial Designation and Record on Appeal immediately and also prepared to file their Final Brief on Appeal as soon as this Motion is granted.

Respondents move for the above stated relief.

Respectfully Submitted,

s/ Brian L. Boger SC BAR# 752
Brian L. Boger
1331 Elmwood Ave.; Suite 210
Columbia, SC 29201
(803)-252-2880
brian@bogerlaw.com
Attorney for the Respondents

January 31, 2022

Columbia, South Carolina

Brian Boger

From: Walter B Todd, Jr. <wtodd@wbt-law.com>
Sent: Thursday, January 13, 2022 3:18 PM
To: Brian Boger
Subject: Re: The Unnamed Joint Venture of Craig Stoneburner et al v. George Anthony Moluf et al.

Brian, I consent to the motion for page 17 to be included in the record on appeal. Walt

Sent from my iPhone

On Jan 13, 2022, at 10:00 AM, Brian Boger <Brian@bogerlaw.com> wrote:

Please listen to the voicemail I just left. Long story short, the Record on Appeal is missing page 17 from the November 2020 hearing with Judge Strickland. I'm sure you didn't intentionally leave it out, but it is important to me. Can you read that page and consent? If I don't hear from you by five today, I'll file a Motion. [REDACTED]

Brian

Brian Boger | Managing Attorney
The Boger Law Firm
1331 Elmwood Avenue, Suite 210 (29202)
Post Office Box 65, Columbia, SC 29201
Office: (803) 252-2880 | Fax: (803) 254-5025
✉ brian@bogerlaw.com

This email and any attachments are intended solely for the use of the addressee. If you are not the intended recipient, please notify the sender immediately and then delete this message. You are hereby notified that this transmission, along with any attachments, is privileged and confidential and may contain information over which The Law Offices of Brian L. Boger has exclusive proprietary rights. This message and any attachments may not be copied, disclosed, or distributed without the prior written consent of The Law Offices of Brian L. Boger. Any opinions expressed in, or other information or conclusions contained in this e-mail or any attachments, may not necessarily be endorsed by The Law Offices of Brian L. Boger. IRS CIRCULAR 230 NOTICE: Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.

BOGER LAW FIRM

1331 ELMWOOD AVENUE, SUITE 210
P.O. Box 65
COLUMBIA, SOUTH CAROLINA 29202

BRIAN L. BOGER
CERTIFIED CIRCUIT COURT MEDIATOR

LESLIE W. PETERS
ASSOCIATE ATTORNEY

TELEPHONE: (803) 252-2880
FACSIMILE: (803) 254-5025
email: brian@brianboger.com
leslie@brianboger.com

February 1, 2022

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

FEB 03 2022

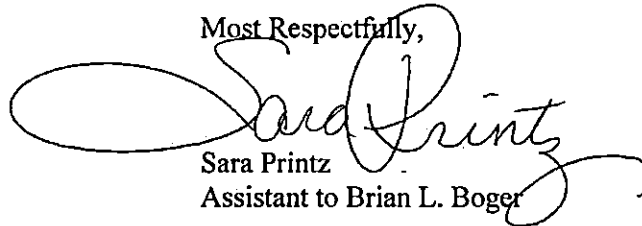
SC Court of Appeals

**RE: The Unnamed Joint Venture of Craig M. Stoneburner, et al. v. George Anthony Moulof, et al.
CA #: 2009-CP-40-03264
Appellate CA#: 2021-000576**

Dear Ms. Kitchings:

I am enclosing herewith several documents for filing. I have also included our firm's check for the filing of the Motion. Should you have any questions or concerns, please feel free to reach out to us at your convenience.

Most Respectfully,


Sara Printz
Assistant to Brian L. Boger

/sp

Enclosures:

cc: Walter B. Todd, Esq.

BOGER LAW FIRM

1331 ELMWOOD AVENUE, SUITE 210
COLUMBIA, SOUTH CAROLINA 29201



US POSTAGE
\$01.96[®]

First-Class

Sorted from 29201
02/01/2022
032A 0061656176

RECEIVED

FEB 03 2022

SC Court of Appeals

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211