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**Jun 08 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Common Pleas Case No. 2019-CP-23-02032

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Appellate Case No. 2021-001177

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Julia Sibley-Jones, as Personal Representative  
of the Estate of William A.L. Sibley, Jr.,

*Respondent,*

Vs.

Decide4Action, Inc.,

*Appellant.*

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**Consent Motion to Supplement Record on Appeal**

Appellant Respondent Decide4Action, Inc. respectfully requests to supplement the Record on Appeal pursuant to 212 SCACR on the following grounds:

Appellant submitted Volumes I and II of the Record on Appeal on May 23, 2022. However, Volume I contained more than five hundred pages and was rejected by the Court. The Court instructed Appellant to correct the Record on Appeal. On June 2, 2022, Plaintiff submitted a corrected Record on Appeal that was accepted by the Court.

After reviewing the Record on Appeal, four documents named in the designation of matters were inadvertently excluded from the Record on Appeal. Appellant seeks an order of this Court to have the Record on Appeal contain all documents designated in the matter to be included. Respondent's Counsel has consented to Supplement the Record on Appeal. (See attached Exhibit A). Wherefore, Appellant asks leave of this Court to enter an Order supplementing the Record on Appeal to include Defendant's Answer, Defendant's Motion in Limine, an Order by this Court, and Notice of Cross Appeal to fully comply with 210 SCACR.

[signature page to follow]

s/Kimberly Thomason

Kimberly Thomason (#79179)

Devon M. Puriefoy (#102097)

Howard Anderson III (# 100329)

TRULUCK THOMASON, LLC

3 Boyce Avenue

Greenville, SC 29681

kim@truluckthomason.com

howard@truluckthomason.com

devon@truluckthomason.com

864-331-1751 (p)

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*Respondent,*

Vs.

Decide4Action, Inc.,

*Appellant.*

Proof of Service

I hereby certify that I have served the foregoing Motion to Supplement Record on the above-named Respondent-Appellant by email as follows:

James E. Cox Jr.  
Greg J. English  
Wyche, P.A.  
P.O. Box 661  
Pendleton, SC 29670  
[jcox@wyche.com](mailto:jcox@wyche.com)

*s/*Kimberly T. Thomason  
Kimberly T. Thomason (#79179)  
TRULUCK THOMASON, LLC  
3 Boyce Avenue  
Greenville, SC 29681  
(864) 331-1751 (p)  
[kim@truluckthomason.com](mailto:kim@truluckthomason.com)  
Attorneys for Appellant-Respondent  
June 8, 2022

## Exhibit A

**Subject:** RE: Julia Sibley-Jones v. Decide4Action - Appellate Case No.: 2021-001177  
**Date:** Wednesday, June 8, 2022 at 9:44:24 AM Eastern Daylight Time  
**From:** James E. Cox, Jr.  
**To:** John-Paul Baum  
**CC:** Devon Puriefoy, Kimberly Thomason, Greg English, Stacey H. Wascom, Howard Anderson  
**Attachments:** image007.png, image008.jpg, image009.png, image010.jpg, image011.png, image001.jpg

John-Paul,

Yes, we consent to this order and the notice of cross-appeal being added to the supplemental record as well. Thanks for working this. Best, Jimmy



**James E. Cox, Jr. | Wyche**

200 East Broad Street, Suite 400 | Greenville, SC 29601-2892

Phone: 864-242-8212 | Fax: (864) 295-3940

[jcox@wyche.com](mailto:jcox@wyche.com) | [www.wyche.com/jcox](http://www.wyche.com/jcox) | [vCard](#)

A Lex Mundi Member Firm

**From:** John-Paul Baum <johnpaul@truluckthomason.com>  
**Sent:** Wednesday, June 8, 2022 9:41 AM  
**To:** James E. Cox, Jr. <jcox@wyche.com>  
**Cc:** Devon Puriefoy <devon@truluckthomason.com>; Kimberly Thomason <kim@truluckthomason.com>; Greg English <genglish@wyche.com>; Stacey H. Wascom <swascom@wyche.com>; Howard Anderson <howard@truluckthomason.com>  
**Subject:** Re: Julia Sibley-Jones v. Decide4Action - Appellate Case No.: 2021-001177

Hi Jimmy:

I went through all of the designation of matters as well as the entire record. Two additional documents are missing and I am seeing if you will consent to add the additional items. The first is an order which dismissed the original appeal (see attached). Additionally, would you like me to add your cross notice of appearance to the record?

Please let me know when your time permits.

John-Paul

# John-Paul Baum

Associate

3 Boyce Ave, Greenville, SC, 29601  
truluckthomason.com

864-331-1751  
johnpaul@truluckthomason.com  
864-243-8115



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**From:** "James E. Cox, Jr." <jcox@wyche.com>  
**Date:** Tuesday, June 7, 2022 at 3:32 PM  
**To:** John-Paul Baum <johnpaul@truluckthomason.com>  
**Cc:** Devon Puriefoy <devon@truluckthomason.com>, Kimberly Thomason <kim@truluckthomason.com>, Greg English <genglish@wyche.com>, "Stacey H. Wascom" <swascom@wyche.com>, Howard Anderson <howard@truluckthomason.com>  
**Subject:** RE: Julia Sibley-Jones v. Decide4Action - Appellate Case No.: 2021-001177

Good to talk to you too, John-Paul. Yes, Plaintiff consents to supplementing the record on appeal with the attached two documents. Thanks for doing that. We will get back to you on timing of final briefs. Best, Jimmy



**James E. Cox, Jr. | Wyche**  
200 East Broad Street, Suite 400 | Greenville, SC 29601-2892  
Phone: 864-242-8212 | Fax: (864) 295-3940  
jcox@wyche.com | [www.wyche.com/jcox](http://www.wyche.com/jcox) | vCard  
A Lex Mundi Member Firm

**From:** John-Paul Baum <johnpaul@truluckthomason.com>  
**Sent:** Tuesday, June 7, 2022 1:23 PM  
**To:** James E. Cox, Jr. <jcox@wyche.com>  
**Cc:** Devon Puriefoy <devon@truluckthomason.com>; Kimberly Thomason <kim@truluckthomason.com>; Greg English <genglish@wyche.com>; Stacey H. Wascom <swascom@wyche.com>; Howard Anderson <howard@truluckthomason.com>  
**Subject:** Re: Julia Sibley-Jones v. Decide4Action - Appellate Case No.: 2021-001177

Jimmy,

It was great speaking with you. It seems the best way to add these documents is to supplement the record on appeal. Will you consent to supplementing the record pursuant to 212 SCACR?

If you need more time for your brief, we are happy to grant that as well.

Thanks,  
John-Paul Baum

## John-Paul Baum

Associate

3 Boyce Ave, Greenville, SC, 29601  
truluckthomason.com

864-331-1751  
johnpaul@truluckthomason.com  
864-243-8115



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**From:** Howard Anderson <[howard@truluckthomason.com](mailto:howard@truluckthomason.com)>  
**Sent:** Monday, June 6, 2022 3:05:42 PM  
**To:** James E. Cox, Jr. <[jcox@wyche.com](mailto:jcox@wyche.com)>  
**Cc:** Devon Puriefoy <[devon@truluckthomason.com](mailto:devon@truluckthomason.com)>; Kimberly Thomason <[kim@truluckthomason.com](mailto:kim@truluckthomason.com)>; Greg English <[genglish@wyche.com](mailto:genglish@wyche.com)>; Stacey H. Wascom <[swascom@wyche.com](mailto:swascom@wyche.com)>  
**Subject:** Re: Julia Sibley-Jones v. Decide4Action - Appellate Case No.: 2021-001177

Hi. In jury trial. Will look at this tonight. If we left something out, we will fix and if needed move for time for final briefs so that y'all aren't bunched up.

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