

STATE OF SOUTH CAROLINA)
)
COUNTY OF Horry)

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
CASE NO.: 2024-CP-26-03798

JENNIFER SPIVEY FOLEY, as Personal)
Representative of the Estate of SCOTT)
RYAN SPIVEY,)

Plaintiff,)

v.)

PLAINTIFF'S MOTION TO COMPEL

CHARLES WELDON BOYD and)
KENNETH WILLIAMS,)

Defendants.)

TO: KENNETH R. MOSS, ESQUIRE, ATTORNEY FOR DEFENDANT CHARLES WELDON BOYD, AND ROBERT E. LEE, ESQUIRE, ATTORNEY FOR DEFENDANT KENNETH WILLIAMS

YOU WILL PLEASE TAKE NOTICE that the Plaintiffs, by and through their undersigned attorney, will move before the Presiding Judge of Common Pleas for the Fifteenth Judicial Circuit, Horry County, on the tenth (10th) day of service hereof, or as soon thereafter as counsel may be heard, for:

An Order requiring the Defendants to Answer the Interrogatories and Request for Production, shown as Exhibit "A" and Exhibit "B", served upon the Defendants on March 20, 2025, shown as Exhibit "C", pursuant to Rule 37 of the South Carolina Rules of Civil Procedure, and to pay reasonable costs and expenses, including attorney's fees incurred in obtaining the Order requiring the Defendants to Answer the Plaintiffs' Interrogatories and Request for Production.

Counsel for Plaintiffs hereby affirms that he has attempted in good faith to resolve the matter contained in the motion by letter dated April 23, 2025, which a copy of said letter is attached hereto as Exhibit "D".

GOODING AND GOODING, P.A.

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-and-

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Attorneys for Plaintiff

May 2, 2025

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