

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

---

Appeal from Charleston County  
Court of Common Pleas  
R. Kirk Griffin, Circuit Court Judge

---

Case No. 2011-CP-10-07166

---

Court of Appeals Case No. 2021-001443  
Order Dismissing Appeal (S.C. Ct. App. filed March 10, 2022)

---

Supreme Court Case No. 2022-000838

---

Otha Delaney,  
Individually and on behalf of all others similarly situated,

Respondent,

v.

First Financial of Charleston, Inc.,

Petitioner.

---

**PROOF OF SERVICE**

---

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioner\**

---

\* Additional counsel identified on following page

CHANDLER & DUDGEON LLC  
Amanda K. Dudgeon (SC Bar No. 72516)  
Tiffany A.P. Elling (SC Bar No. 104224)  
180 East Bay Street, Suite 200  
Charleston, South Carolina 29401  
P.O. Box 547 (29402)  
(843) 577-5410

*Additional Counsel for Petitioner*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Petitioner, hereby certify that Petitioner's **PETITION FOR A WRIT OF CERTIORARI** was served on all parties to this matter on July 7, 2022, by emailing (see attached) a copy of the same to the following counsel of record:

Amanda K. Dudgeon, Esquire  
[mandi@chandlerdudgeon.com](mailto:mandi@chandlerdudgeon.com)  
Tiffany A.P. Elling, Esquire  
[tiffany@chandlerdudgeon.com](mailto:tiffany@chandlerdudgeon.com)  
Chandler & Dudgeon LLC  
P.O. Box 547  
Charleston, SC 29402

*Additional Counsel for Petitioner*

J. Ashley Twombly, Esquire  
[twombly@twlawfirm.com](mailto:twombly@twlawfirm.com)  
Lee Anne Walters, Esquire  
[lwalters@twlawfirm.com](mailto:lwalters@twlawfirm.com)  
Twenge & Twombly, LLC  
311 Carteret Street  
Beaufort, SC 29902

*Attorneys for Respondent*

Frederick M. Corley, Esquire  
[rick@1214law.com](mailto:rick@1214law.com)  
Frederick M. Corley, Esq., P.A.  
1214 King Street  
Beaufort, SC 29902

*Additional Counsel for Respondent*

Philip L. Fairbanks, Esquire  
[dale.h.friedman@gmail.com](mailto:dale.h.friedman@gmail.com)  
Philip Fairbanks, Esq., PC  
503 Craven Street  
Beaufort, SC 29902

*Additional Counsel for Respondent*

Graham Edward Hawkins, III, Esquire  
[hawkinslawfirm@aol.com](mailto:hawkinslawfirm@aol.com)  
Hawkins Law Firm, PA  
800 Wappoo Road  
Charleston, SC 29407

*Additional Counsel for Respondent*

I also certify that Petitioner's **PETITION FOR A WRIT OF CERTIORARI** is being filed with the South Carolina Court of Appeals on July 7, 2022, via email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org), contemporaneously with the filing of the same in this Court, via email to [supctfilings@sccourts.org](mailto:supctfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Petitioner*

Charleston, South Carolina

July 7, 2022

**From:** [Hines, Russell](#)  
**To:** [hawkinslawfirm@aol.com](mailto:hawkinslawfirm@aol.com); [Twombley@twlawfirm.com](mailto:Twombley@twlawfirm.com); [andrea@twlawfirm.com](mailto:andrea@twlawfirm.com); [rick@1214law.com](mailto:rick@1214law.com); [mandi@chandlerdudgeon.com](mailto:mandi@chandlerdudgeon.com); [tiffany@chandlerdudgeon.com](mailto:tiffany@chandlerdudgeon.com); [walters@twlawfirm.com](mailto:walters@twlawfirm.com); [dale.h.friedman@gmail.com](mailto:dale.h.friedman@gmail.com)  
**Cc:** [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); ["Brown, Steve"](#)  
**Subject:** Delaney v. First Financial //Appellate Case No. 2022-000838 (Supreme Court) ; 2021-001443 (Court of Appeals) -  
- Petition for a Writ of Certiorari  
**Date:** Thursday, July 7, 2022 11:32:18 PM  
**Attachments:** [image002.png](#)  
[Delaney v. FFC \(Sup. Ct. No. 2022-000838; Ct. App. No. 2021-001443\) -- Petition for a Writ of Certiorari.pdf](#)

---

Attached please find Petitioner's **Petition for a Writ of Certiorari** in the above-referenced matter.

Russell G. Hines  
CLEMENT RIVERS, LLP  
[www.ycrlaw.com](http://www.ycrlaw.com)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
Phone: (843) 720-5488  
Fax: (843) 579-1327  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)



**CLEMENT RIVERS, LLP**

25 Calhoun Street • Suite 400 • Charleston, SC 29401  
[ycrlaw.com](http://ycrlaw.com)