

**The State of South Carolina  
In the Supreme Court**

**RECEIVED**

**Oct 10 2022**

**S.C. SUPREME COURT**

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**APPEAL FROM BEAUFORT COUNTY**  
Court of Common Pleas  
The Honorable Marvin H. Dukes, III, Master in Equity

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**Case No. 2014-CP-07-0052**  
**Appellate Case Nos. 2018-001969, 2019-001270**

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Lady Beaufort, LLC & Tideland Realty, Inc.....*Petitioners,*

v.

Hird Island Investments, Inc., Sherwood N. Fender, Addison D. Fender, Martha B. Fender, William B. Bowen, Lady Kemmerlin, LLC, Brickyard Holdings, Inc., and A&K Holding Co., LLC, Defendants,

And

William M. Bowen, Third-Party Plaintiff,

v.

James S. Kerr and Matt Trumps, Third-Party Defendants,  
*Of Which Hird Island Investments, Inc. and Sherwood N. Fender are the Respondents.*

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**PROOF OF SERVICE**

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I certify that I have served Petitioners' Reply in Support of Petition for Certiorari on opposing counsel via e-mail, on October 10, 2022, addressed to Respondents' attorney of record as follows:

H. Fred Kuhn, Jr., Esquire  
P.O. Drawer 507  
Beaufort, SC 29901  
[fred@mossandkuhn.com](mailto:fred@mossandkuhn.com)

A copy of the email is attached to this Proof of Service as Exhibit A.

By /s/ Angela Gross  
Angela Gross  
Legal Assistant to Jaan G. Rannik, Esq.  
EPTING & RANNIK, LLC  
46A State Street, Charleston, SC 29401

# EXHIBIT A

## Angela Gross

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**From:** Angela Gross  
**Sent:** Monday, October 10, 2022 3:19 PM  
**To:** fred@mossandkuhn.com  
**Cc:** sue@mossandkuhn.com; Jaan Rannik; Andrew K. Epting; Clinton T. Magill; Angela Gross  
**Subject:** RE: Lady Beaufort, LLC v. v. Hird Island Investments, 2018-001969 & 2019-001270  
**Attachments:** 2022 10 10 - Ltr to Supreme Court enc Petitioners' Reply in Support of Petition for Certiorari.pdf;  
2022 10 10 - Reply Brief in Supp. Petition.pdf

Mr. Kuhn,

Attached for service is Petitioners' Reply In Support of the Petition for Writ of Certiorari by Lady Beaufort, LLC and Tideland Realty, Inc. in the above appeals.

A Proof of Service of the Petition will follow under separate cover email.

With kindest regards,



Angela Gross  
Legal Assistant to Andrew K. Epting, Jr., Esquire  
Jaan G. Rannik, Esquire  
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