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**To: South Carolina Court of Appeals  
Clerk of Court  
1220 Senate Street  
Columbia, SC 29201**

**RECEIVED**

**Oct 13 2022**

**SC Court of Appeals**

**Re: *Gregory Muxlow and Charlotte Muxlow v. Scottsdale Insurance Company, et al.*  
Appellate Case No. 2022-000576**

**Date: Thursday, October 13, 2022**

Dear sir or ma'am,

We write this letter in response to Appellants' October 13, 2022 communication with the Court of Appeals. In that letter, Appellant contends that my client, Scottsdale Insurance Company failed to provide or serve its brief to Appellant. Due to that "failure" of service, Appellants request a second extension of time from the Court.

This is the first time that Appellants have ever communicated to us that they did not receive service of Scottsdale's initial brief. We note that Scottsdale's Initial Brief is on the Public Index for the Court. To clear matters up on the issue of service and receipt, attached is the electronic service which indicates that Appellants, through counsel Josh Hawkins and Helena Jedziniak, were served with Scottsdale's initial brief on September 6, 2022 at 12:56 pm. Additionally, attached is correspondence from the Court regarding Scottsdale's filed brief on which Mr. Hawkins and Ms. Jedziniak were copied. Even if the September 6, 2022 electronic service was not received by Appellants, this September 7, 2022 correspondence would have notified Appellants that a brief had been filed. Given proof of this electronic service, we do not know why Mr. Hawkins or Ms. Jedziniak did not receive the brief. Moreover, because these documents are all on the Public Index, we also do not know why Appellants did not check the Index before writing its October 13, 2022 letter to the Court.

Out of courtesy and professionalism, Scottsdale does not object to Appellants' second request for an extension; however, Scottsdale would have appreciated correspondence from

Appellants prior to this communication with the Court. Scottsdale certainly defers to the Court on its timing and management of its docket.

Thank you for your time and attention.

Pamela Larson

Sincerely,



Pamela J. Larson  
Attorney at Law  
Womble Bond Dickinson

Cc: Josh Hawkins and Helena Jedziniak  
1225 S. Church St.  
Greenville, SC 29605

Jay Anthony  
650 E. Washington St.  
Greenville, SC 29601

Enclosures: Ctrack Documents: (1) September 6, 2022 electronic service of Scottsdale's initial brief; (2) September 6, 2022 proof of service; (3) September 7, 2022 correspondence from the Court of Appeals; (4) September 7, 2022 cover email from the Court of Appeals; (5) Scottsdale's response to the Court of Appeals September 7, 2022 correspondence

**From:** [Miller, Michelle](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [josh@hjlsc.com](#); [helena@hjlsc.com](#); [janthony@anthonylawsc.com](#); [Larson, Pamela](#); [Ward, Harriet](#)  
**Subject:** Muxlow v. Scottsdale Insurance Company  
**Date:** Tuesday, September 6, 2022 12:56:11 PM  
**Attachments:** [imageeee20f4.PNG](#)  
[image5f7901.PNG](#)  
[image8054e.PNG](#)  
[imagef0ce6f.PNG](#)  
[Muxlow v. Scottsdale initial brief.pdf](#)  
[Muxlow v. Scottsdale Proof of Service.pdf](#)

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**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good afternoon.

Please find the attached for filing, Respondent Scottsdale Insurance Company's Initial Brief in the above-referenced case, along with Proof of Service to all parties. All parties are being served via this correspondence.

Thank you.

**Michelle Miller**

Legal Practice Assistant  
Womble Bond Dickinson (US) LLP

d: 843-576-5527

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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Edward W. Miller, Circuit Court Judge

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Case No. 2022-CP-000576

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Gregory Muxlow and Charlotte Muxlow, Appellants,

v.

Scottsdale Insurance Company, South Wind Ranch Holdings, LLC, Ronald Hakala and  
Ashley Black,

Of which Scottsdale Insurance Company is the Respondent.

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**PROOF OF SERVICE**

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I certify that on this date, September 6, 2022, I filed the foregoing Respondent's Initial Brief with the South Carolina Court of Appeals via electronic filing only, to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org) and served a copy on Appellants via electronic service, addressed to the attorneys of record below:

*(ADDRESSEES AND SIGNATURE PAGE FOLLOWS)*

Joshua T. Hawkins  
Hawkins & Jedziniak, LLC  
1225 South Church Street  
Greenville, South Carolina 29605  
Attorney for Appellant

Jay Anthony  
Anthony Law, LLC  
650 E. Washington Street  
Greenville, South Carolina 29601  
Attorney for South Wind Ranch, Ashley Black, and Ronald Hakala

**WOMBLE BOND DICKINSON (US) LLP**

s/Pamela J. Larson  
Harriet Condon Ward (SC Bar No. 104279)  
Pamela J. Larson (SC Bar No. 104181)  
5 Exchange Street (29401)  
P.O. Box 999  
Charleston, SC 29402

**Attorneys for Respondent  
Scottsdale Insurance Company**

Charleston, SC

September 6, 2022



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
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V. CLAIRE ALLEN  
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September 07, 2022

Ms. Harriet Condon Ward, Esquire  
PO Box 999  
Charleston SC 29402

Ms. Pamela Jean Larson, Esquire  
5 Exchange St.  
Charleston SC 29401-2948

Re: Gregory Muxlow v. Scottsdale Insurance  
Appellate Case No. 2022-000576

Dear Counsel:

Upon reviewing your respondent's initial brief, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- The initial brief is not accompanied by a designation of matter to be included in the record on appeal.

Very truly yours,

*V. Claire Allen*

CLERK

cc: Joshua Thomas Hawkins, Esquire  
Helena LeeAnn Jedziniak, Esquire

**From:** [Cerchione, Carla](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Larson, Pamela](#); [Ward, Harriet](#); [JAnthony@anthonylawsc.com](mailto:JAnthony@anthonylawsc.com); [Josh Hawkins](#); [Helena Jedziniak](#); [monica@hillcsc.com](mailto:monica@hillcsc.com)  
**Subject:** Gregory Muxlow, et al vs. Scottsdale Insurance Company, et al; Case No. 2022-000576  
**Date:** Thursday, September 15, 2022 2:33:56 PM  
**Attachments:** [imagea559a1.PNG](#)  
[image976273.PNG](#)  
[imagea2f4f1.PNG](#)  
[image6ff223.PNG](#)  
[Scottsdale DOM.pdf](#)

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Good afternoon,

Pursuant to the correspondence received in the above referenced matter, attached is a copy of Respondent Scottsdale Insurance Company's Designation of Matter. All parties of record are being served electronically, via this correspondence. Please advise should the Court request a physical copy. Thank you.

**Carla Cerchione**

Legal Practice Assistant  
Womble Bond Dickinson (US) LLP

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## Ritchie, Sierra

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**From:** Ritchie, Sierra  
**Sent:** Wednesday, September 7, 2022 2:55 PM  
**To:** 'josh@hjlsc.com'; 'helena@hjlsc.com'; 'harriet.ward@wbd-us.com';  
'janthony@anthonylawsc.com'  
**Cc:** 'monica@hjlsc.com'; 'carla.cerchione@wbd-us.com'; 'jwolfla@anthonylawsc.com'  
**Subject:** Gregory Muxlow v. Scottsdale Insurance // 2022-000576  
**Attachments:** Muxlow v. Scottsdale Ins - RIB deficiency letter.pdf; Muxlow v. Scottsdale Insurance - RIB Deficiency Letter.pdf

Dear Counsel:

Attached please find correspondence from the Court of Appeals. Please do not respond to this email. Send all correspondence to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully,

*Sierra Ritchie*

Appeals Specialist II

SC Court of Appeals

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E-filing Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)