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November 21, 2022

## VIA EMAIL FILING

The Hon. Jenny Abbott Kitchings

Clerk of Court

S.C. Court of Appeals

[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RECEIVED**

**Nov 21 2022**

**SC Court of Appeals**

**Re: Raglins Creek Farms, LLC v. Nancy Dunn Martin  
Case No. 2017-001795, Our File No. 8-2376.102**

Dear Ms. Kitchings:

We are in receipt of the order issued November 3, 2022, requesting selected original exhibits from the underlying trial in the above-referenced appeal. As Appellant's counsel, we have sought to procure the exhibits but have not been met with success. Mr. Truitt at the Richland County Clerk's office was able to provide us with Plaintiff's Exhibits 19 and 49, which we will convey to your office by the deadline.

However, the Richland Clerk's office has none of the other exhibits requested. We have also sought information about any other original exhibits from the trial court (the Richland County Master-in-Equity), the trial court reporter (Creel Court Reporting), and Respondent's counsel. None of these sources have provided other exhibits.

Therefore, we seek the Court's guidance on next steps. If the Court needs larger versions of some of the map or plat exhibits from the trial than are presented in the transcript, we are happy to work with opposing counsel to create replacement exhibits by consent.

With my kindest regards, I am,

Sincerely,



Chelsea J. Clark

CJC/hos

cc: John W. Wells, Esq. ([jwells@baxleywells.com](mailto:jwells@baxleywells.com))

M. Brent McDonald, Esq. ([brent@bundymcdonald.com](mailto:brent@bundymcdonald.com))

**From:** [JIM TRUITT](#)  
**To:** [Leigh Dominick](#)  
**Subject:** RE: Order for Exhibits (2014-1805)  
**Date:** Friday, November 18, 2022 12:39:11 PM

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Good afternoon Leigh, Sorry I could not help you any better! On 5-3-16 I received from the Master In Equity's office three exhibits only. Plaintiff's exhibits #19, #49 ( medium poster boards ) and Court's #1 a typed and video DVD deposition of Claude E. Campbell. According to the exhibit sticker the hearing was on 3-22-16. Jim

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**From:** Leigh Dominick <LDominick@brunerpowell.com>  
**Sent:** Friday, November 18, 2022 10:53 AM  
**To:** JIM TRUITT <TRUITT.JIM@richlandcountysc.gov>  
**Cc:** Chelsea Clark <cclark@brunerpowell.com>  
**Subject:** RE: Order for Exhibits (2014-1805)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Jim.

As you can well imagine, we are not having any luck finding the exhibits that the Court of Appeals has asked us for. Do you mind sending me a separate email letting us know that you were only able to find the 2 exhibits that you produced to us?

Thank you for all of your help!

Kind Regards,

*Leigh A. Dominick, PP. SCCP*

**Certified Paralegal**

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**From:** JIM TRUITT <[TRUITT.JIM@richlandcountysc.gov](mailto:TRUITT.JIM@richlandcountysc.gov)>

**Sent:** Friday, November 4, 2022 10:46 AM

**To:** Leigh Dominick <[LDominick@brunerpowell.com](mailto:LDominick@brunerpowell.com)>

**Subject:** RE: Order for Exhibits (2014-1805)

Got it.....thanks. Jim

---

**From:** Leigh Dominick <[LDominick@brunerpowell.com](mailto:LDominick@brunerpowell.com)>

**Sent:** Friday, November 4, 2022 10:28 AM

**To:** JIM TRUITT <[TRUITT.JIM@richlandcountysc.gov](mailto:TRUITT.JIM@richlandcountysc.gov)>

**Cc:** Joey Floyd <[jfloyd@brunerpowell.com](mailto:jfloyd@brunerpowell.com)>; Chelsea Clark <[cclark@brunerpowell.com](mailto:cclark@brunerpowell.com)>

**Subject:** Order for Exhibits (2014-1805)

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Good morning, Jim.

Please find attached the Order we spoke about a few minutes ago by phone. Please let me know when these exhibits are ready for us to pick up.

Thank you!

Kind Regards,

*Leigh A. Dominick, PP. SCCP*

Certified Paralegal

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