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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

RECEIVED

Nov 21 2022

SC Court of Appeals

Re: Raglins Creek Farms, LLC v. Nancy Dunn Martin
Case No.: 2017-001795

Dear Ms. Kitchings:

Having read Ms. Clarke's November 21, 2022, letter regarding the missing exhibits, I need to update the Court and Appellant on our response to this problem. The following Plaintiff's exhibits were enlarged maps and aerial photos that were mounted for use at trial by Michael Mills of Glenn and Associates Surveyors:

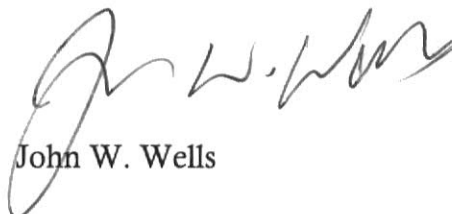
Plaintiff's exhibits 2, 6, 8, 41, 42, 43, 44, 45, 46, 47, 49, 51, 52, 53, 54, and 55.

At a cost of two thousand one hundred sixty-nine and 15/100 (\$2,169.15) dollars, the Respondent has obtained accurate, mounted reproductions of those exhibits from Michael Mills. The exhibit number stickers that were applied by the Court Reporter are missing on the reproductions, but each exhibit has the correct exhibit number written in longhand on the back of the exhibit so that each can be identified. The reproductions can also be compared to the 8 ½ x 11 copies in the Record of Appeal to identify each exhibit.

As stated above, the reproductions were produced by the same firm in the same manner as the original exhibits. It is my understanding that from Ms. Clark that Plaintiff's exhibit 19 and 49 have been found by the Clerk of Court. I propose that I deliver the reproductions to the Court of Appeals by Wednesday, November 23, 2022, which is the deadline in the November 3, 2022, Order. Perhaps they could be held by you as the Clerk of Court to give Appellant's counsel an opportunity to see them before they are sent to the Judges who will hear oral argument. The schedule is tight at this point, and I would like to deliver these exhibits directly to the Court of Appeals to prevent any further loss if possible. With regard to maps and aerial photos, size matters, and the small copies in the Record on Appeal simply are not readable. If my proposal does not suit, we are open to input from all parties.

Very truly yours,

BAXLEY, WELLS & BENSON, P.A.

A handwritten signature in black ink, appearing to read "John W. Wells". The signature is fluid and cursive, with a large initial "J" and "W".

John W. Wells

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