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**Subject:** Appeal. Keiffer vs Carolina Heritage LLC, et al 2022-001054  
**Date:** Thursday, December 1, 2022 10:17:07 AM  
**Attachments:** [Designation of Matter.pdf](#)  
[Proof of Service Respondent.pdf](#)  
[Brief of Respondent.pdf](#)

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To The Honorable Jenny Abbott Kitchings:

Attached is our Initial Brief of Respondent, Respondent's Designation of Matter to be Included in the Record on Appeal, and Proof of Service in the above matter. Please note that I have included all opposing counsel (and paralegals) on this email for evidence of serving the above documents on all parties. Should you require anything further, please notify this office.

With warmest regards,  
Russ Keep, Esq.