

**From:** [Christian Stegmaier](#)  
**To:** [Justin Lucey](#); [Kitchings, Jenny](#); [Buckley, Edward D. \(Ed\)](#)  
**Cc:** [Harrison, Catherine](#); [Tarsha M. Jefferson](#); [Stephanie Drawdy](#); [Joshua Evans](#); [Anna McCann](#); [James L. Williams](#); [Jennifer Zambriczki](#); [Jean-Charles, Alice](#); [sdrawdy@aol.com](#); [Lee Weiland](#); [Kristina Shernoff](#); [Allen, Claire](#); [Richelle Campbell](#)  
**Subject:** RE: 2019-001790 Palmetto Pointe v. Tri-County Roofing  
**Date:** Thursday, December 22, 2022 2:24:34 PM

---

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

Appellant can do the same; **February 14 will work just fine**. Just let us know the time when it gets set.

Happy holidays to everyone on this chain; hope everyone gets some well deserved rest.

CS

---

**From:** Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>  
**Sent:** Thursday, December 22, 2022 2:12 PM  
**To:** Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>; Buckley, Edward D. (Ed) <[ebuckley@yclaw.com](mailto:ebuckley@yclaw.com)>  
**Cc:** Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>; Tarsha M. Jefferson <[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com)>; Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans <[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>; Christian Stegmaier <[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)>; James L. Williams <[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)>; Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>; Jean-Charles, Alice <[ajeancharles@yclaw.com](mailto:ajeancharles@yclaw.com)>; [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland <[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[kshernoff@lucey-law.com](mailto:kshernoff@lucey-law.com)>; Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>; Richelle Campbell <[rcampbell@collinsandlacy.com](mailto:rcampbell@collinsandlacy.com)>  
**Subject:** RE: 2019-001790 Palmetto Pointe v. Tri-County Roofing

Plaintiff/Respondent can be available Feb. 14.

Justin Lucey

---

**From:** Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>  
**Sent:** Thursday, December 22, 2022 2:10 PM  
**To:** Buckley, Edward D. (Ed) <[ebuckley@yclaw.com](mailto:ebuckley@yclaw.com)>; Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>  
**Cc:** Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>; Tarsha M. Jefferson <[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com)>; Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans <[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>; Christian Stegmaier <[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)>; James L. Williams <[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)>; Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>; Jean-Charles, Alice <[ajeancharles@yclaw.com](mailto:ajeancharles@yclaw.com)>; [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland <[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[kshernoff@lucey-law.com](mailto:kshernoff@lucey-law.com)>; Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>; Richelle Campbell <[rcampbell@collinsandlacy.com](mailto:rcampbell@collinsandlacy.com)>  
**Subject:** RE: 2019-001790 Palmetto Pointe v. Tri-County Roofing

Dear Counsel,

Thank you so much for your timely responses. It has become necessary to find another date to argue this appeal. We are unable to schedule this case for January 2023. Would you be available to argue this case on February 14,

2023? Please reply to this email to let us know.

Warmly,

Jenny

**Jenny Abbott Kitchings**  
*Clerk of Court*  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
Ph: (803) 734-1891

---

**From:** Buckley, Edward D. (Ed) <[ebuckley@ycrlaw.com](mailto:ebuckley@ycrlaw.com)>

**Sent:** Monday, December 19, 2022 1:14 PM

**To:** Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>

**Cc:** Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>; Tarsha M. Jefferson <[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com)>; Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>; Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans <[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>; Christian Stegmaier <[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)>; James L. Williams <[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)>; Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>; Jean-Charles, Alice <[ajeancharles@ycrlaw.com](mailto:ajeancharles@ycrlaw.com)>; [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland <[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[kshernoff@lucey-law.com](mailto:kshernoff@lucey-law.com)>; Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>; Richelle Campbell <[rcampbell@collinsandlacy.com](mailto:rcampbell@collinsandlacy.com)>

**Subject:** Re: 2019-001790 Palmetto Pointe v. Tri-County Roofing

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

I am co-counsel with Mr. Lucey and confirm the new date and time. No conflicts here.

Sent from my iPhone

On Dec 19, 2022, at 12:39 PM, Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)> wrote:

Change received. No conflict.

Counsel for Plaintiffs/Respondents.

Justin Lucey

Justin Lucey  
Justin O'Toole Lucey, PA  
843-849-8400

On Dec 19, 2022, at 12:29 PM, Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)> wrote:

Dear Counsel,

Good afternoon. After further consideration, the panel wishes to hold oral argument in this appeal on January 9, 2023, at 11:00 am in Courtroom I. Please reply to this email to confirm receipt, and to let us know if you have a conflict.

Thank you.

**Catherine Harrison**

Deputy Clerk of Court  
South Carolina Court of Appeals  
(803) 734-1187  
[charrison@sccourts.org](mailto:charrison@sccourts.org)

---

**From:** Tarsha M. Jefferson <[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com)>

**Sent:** Tuesday, November 15, 2022 4:34 PM

**To:** Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>; Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>

**Cc:** [ebuckley@ycrlaw.com](mailto:ebuckley@ycrlaw.com); Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans <[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>; Christian Stegmaier <[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)>; James L. Williams <[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)>; Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>; [ajeancharles@ycrlaw.com](mailto:ajeancharles@ycrlaw.com); [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland <[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[kshernoff@lucey-law.com](mailto:kshernoff@lucey-law.com)>; Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>; Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>; Richelle Campbell <[rcampbell@collinsandlacy.com](mailto:rcampbell@collinsandlacy.com)>

**Subject:** RE: 2019-001790 Palmetto Pointe v. Tri-County Roofing

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

Counsel for Appellant Tri-County Roofing is available.

Thanks.

---

**From:** Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>

**Sent:** Tuesday, November 15, 2022 2:28 PM

**To:** Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>

**Cc:** [ebuckley@ycrlaw.com](mailto:ebuckley@ycrlaw.com); Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans <[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>; Christian Stegmaier <[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)>; James L. Williams <[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)>; Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>; [ajeancharles@ycrlaw.com](mailto:ajeancharles@ycrlaw.com); [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland <[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[kshernoff@lucey-law.com](mailto:kshernoff@lucey-law.com)>; State Filing <[statefiling@collinsandlacy.com](mailto:statefiling@collinsandlacy.com)>; Tarsha M. Jefferson <[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com)>; Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>; Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>

**Subject:** Re: 2019-001790 Palmetto Pointe v. Tri-County Roofing

Respondent Peas Island will make January 10 work.

Justin Lucey

On Nov 15, 2022, at 2:20 PM, Kitchings, Jenny  
<[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)> wrote:

Dear Counsel,

Thank you for your prompt responses. The oral argument scheduled for November 17, 2022, is cancelled. The panel would like to reschedule the argument for January 10, 2023. Please reply to this email to let me know whether you have conflicts for January 10.

Warmly,

Jenny

**Jenny Abbott Kitchings**

*Clerk of Court*

South Carolina Court of Appeals

1220 Senate Street

Columbia, SC 29201

Ph: (803) 734-1891

---

**From:** Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>

**Sent:** Tuesday, November 15, 2022 10:52 AM

**To:** Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>; [ebuckley@yctrlaw.com](mailto:ebuckley@yctrlaw.com);

Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans

<[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>;

[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com); [jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)

**Cc:** Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>;

[ajeanchares@yctrlaw.com](mailto:ajeanchares@yctrlaw.com); [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland

<[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[\[law.com\]\(mailto:law.com\)>; \[statefiling@collinsandlacy.com\]\(mailto:statefiling@collinsandlacy.com\);](mailto:kshernoff@lucey-</a></p></div><div data-bbox=)

[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com); Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>;

Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>

**Subject:** RE: 2019-001790 Palmetto Pointe v. Tri-County Roofing

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

Ms. Kitchings,

I am conflicted on Dec. 7. I have circuit court protection for out of state obligations from Dec. 5 to 21, except Dec. 14. On Dec. 14, I am scheduled to argue in front of the SC Supreme Court at 11 am.

Please let me know what other scheduling options are available ?

Thank you

Justin Lucey

---

**From:** Kitchings, Jenny <[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)>  
**Sent:** Tuesday, November 15, 2022 10:44 AM  
**To:** Justin Lucey <[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)>; [ebuckley@yctrlaw.com](mailto:ebuckley@yctrlaw.com);  
Stephanie Drawdy <[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)>; Joshua Evans  
<[jevans@lucey-law.com](mailto:jevans@lucey-law.com)>; Anna McCann <[amccann@lucey-law.com](mailto:amccann@lucey-law.com)>;  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com); [jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)  
**Cc:** Jennifer Zambriczki <[jzambriczki@lucey-law.com](mailto:jzambriczki@lucey-law.com)>;  
[ajeancharles@yctrlaw.com](mailto:ajeancharles@yctrlaw.com); [sdrawdy@aol.com](mailto:sdrawdy@aol.com); Lee Weiland  
<[lweiland@lucey-law.com](mailto:lweiland@lucey-law.com)>; Kristina Shernoff <[kshernoff@lucey-law.com](mailto:kshernoff@lucey-law.com)>;  
[statefiling@collinsandlacy.com](mailto:statefiling@collinsandlacy.com);  
[tjefferson@collinsandlacy.com](mailto:tjefferson@collinsandlacy.com); Allen, Claire <[CAllen@sccourts.org](mailto:CAllen@sccourts.org)>;  
Harrison, Catherine <[CHarrison@sccourts.org](mailto:CHarrison@sccourts.org)>  
**Subject:** 2019-001790 Palmetto Pointe v. Tri-County Roofing

Dear Counsel,

Good morning. It has become necessary to move the date of oral argument in the above-referenced appeal. The panel wishes to hold oral argument on December 7, 2022, at 11:20 am in Courtroom I. Please reply to this email to confirm receipt, and to let us know if you have a conflict.

Warmly,

Jenny

**Jenny Abbott Kitchings**  
*Clerk of Court*  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
Ph: (803) 734-1891

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you

are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**Tarsha M. Jefferson**  
Senior Paralegal

Direct: 803.255.0456

Main: 803.256.2660

Fax: 803.771.4484

Vcard: [download vcard](#)

Web: [https://link.edgепilot.com/s/5110f961/iTMutJ8KqkSZ2DN0kZKJ8A?  
u=http://www.collinsandlacy.com/](https://link.edgепilot.com/s/5110f961/iTMutJ8KqkSZ2DN0kZKJ8A?u=http://www.collinsandlacy.com/)

1330 Lady Street, 6th Floor  
Columbia, SC 29201

[<~WRD000.jpg>](#)

---

**Confidentiality Note:** The preceding email message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message. Legal advice contained in the preceding message is solely for the benefit of the Collins and Lacy, P. C. client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party.

In light of the Amended Order of the S.C. Supreme Court effective February 4, 2022 (Order 2020-04-03-01), we will be serving discovery via e-mail only.

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

Clement Rivers, LLP

[https://link.edgепilot.com/s/69abfd81/py\\_SijaCzU2umKrjApO3SQ?u=https://checkpoint.url-protection.com/v1/url?  
o=http%253A//www.yclaw.com%26g=Mzg0MGE4MTEyZjBiYjliYg==%26h=YTBkOTU5ZjcyNzNINWI4ODc5YzE3MTQ5MzBlYzlxMjcyNmIzMGY4YjAyOTcyZWExNTQxNTM2NWMwYzk2NjdkZQ==%26p=YzJ1OnNjanVkaWNpYWw6YzpvOmNmZWYxYWUzOTlkOTczOWU3YjhhYmYyMDA3MWFjNGZiOnYxOnQ6VA==](https://link.edgепilot.com/s/69abfd81/py_SijaCzU2umKrjApO3SQ?u=https://checkpoint.url-protection.com/v1/url?o=http%253A//www.yclaw.com%26g=Mzg0MGE4MTEyZjBiYjliYg==%26h=YTBkOTU5ZjcyNzNINWI4ODc5YzE3MTQ5MzBlYzlxMjcyNmIzMGY4YjAyOTcyZWExNTQxNTM2NWMwYzk2NjdkZQ==%26p=YzJ1OnNjanVkaWNpYWw6YzpvOmNmZWYxYWUzOTlkOTczOWU3YjhhYmYyMDA3MWFjNGZiOnYxOnQ6VA==)  
Charleston: (843) 577-4000

Attachments larger than 40MB may be rejected by the firm's server. If you are sending an attachment of this size or larger, please contact the intended recipient to inform him/her of your transmission.

"ATTORNEY-CLIENT PRIVILEGED; DO NOT FORWARD WITHOUT PERMISSION." The information contained in this transmission is privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any

dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or by email to [email@yclr.com](mailto:email@yclr.com) or by replying to this message and destroy all copies of this message and all attachments.

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

**Christian Stegmaier**

Direct: 803.255.0454

Main: 803.256.2660

Fax: 803.771.4484

Vcard: [download vcard](#)

Web: [www.collinsandlacy.com](http://www.collinsandlacy.com)

1330 Lady Street, 6th Floor  
Columbia, SC 29201



---

**Confidentiality Note:** The preceding email message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message. Legal advice contained in the preceding message is solely for the benefit of the Collins and Lacy, P. C. client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party.

In light of the Amended Order of the S.C. Supreme Court effective February 4, 2022 (Order 2020-04-03-01), we will be serving discovery via e-mail only.