

**From:** [David Conor keys](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132  
**Date:** Tuesday, January 3, 2023 11:02:23 AM  
**Attachments:** [motion for protection.pdf](#)

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

To whom it may concern

Please find with regard to the above referenced matter the following from Appellant:

1. A Motion for Protection from Court Appearance; and
2. Appellant's Certificates of Counsel for the Motion.

A check for the Motion is being placed in the mail to the Court with a hard copy of the Motion.

I kindly request to you file the same. Thank you for your time and consideration.

D. Conor Keys  
The Law Office of  
David Conor Keys, LLC  
PO Box 14225  
Charleston, SC 29422  
843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

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---

**From:** [Court Of Appeals Filings](#)  
**Sent:** Friday, July 16, 2021 2:22 PM  
**To:** [David Conor keys](#); [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** David Conor keys [mailto:conor@dconorkeyslaw.com]

**Sent:** Friday, July 16, 2021 1:47 PM

**To:** Court Of Appeals Filings <ctappfilings@sccourts.org>

**Cc:** Michael O'Connell <moconnell@stirlingoconnell.com>; Kerry Koon <kerrykoon@hotmail.com>; karen@dejonglawfirm.com; Bruce@berlinskylawfirm.com

**Subject:** RE: 2020-001132

To whom it may concern

Please find with regard to the above referenced matter the following from Appellant:

3. Appellant's Certificate of Counsel for its Final Brief
4. Appellant's Certificates of Counsel for its four Final Reply Briefs
5. A Proof of Service for the Same

I kindly request to you file the same. Have a nice weekend.

D. Conor Keys

The Law Office of

David Conor Keys, LLC

PO Box 14225

Charleston, SC 29422

843-906-3998

[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

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---

**From:** [Court Of Appeals Filings](#)

**Sent:** Tuesday, July 6, 2021 9:33 AM

**To:** [David Conor keys](#); [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** David Conor keys [<mailto:conor@dconorkeyslaw.com>]

**Sent:** Tuesday, July 6, 2021 8:51 AM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Michael O'Connell <[moconnell@stirlingoconnell.com](mailto:moconnell@stirlingoconnell.com)>; Kerry Koon <[kerrykoon@hotmail.com](mailto:kerrykoon@hotmail.com)>; [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To whom it may concern

Please find with regard to the above referenced matter the following from Appellant:

1. Appellant's Final Brief;
2. Appellant's Final Reply Brief to Inman's Response;
3. Appellant's Final Reply Brief to Kennedy's Response;
4. Appellant's Final Reply Brief to Smith's Response;
5. Appellant's Final Reply Brief to Berlinsky's Response; and
6. Appellant's certificate of service.

Additionally the court will be immediately receiving from a separate email through this counsel's "My Case" Software a link to an electronic copy of the Record on Appeal. Finally Appellant has placed in the mail to the court a one unbound copy of the record on appeal as well as one bound copy of the record on appeal and all of Appellant's final briefs.

D. Conor Keys

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Charleston, SC 29422

843-906-3998

[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

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---

**From:** [David Conor keys](#)

**Sent:** Tuesday, June 1, 2021 10:35 AM

**To:** [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To whom it may concern

Please find with regard to the above referenced matter Appellant's Motion for an a 10 day Extension of Time to file Appellant's final briefs and the Record on Appeal, as well as a certificate of service for the same. I kindly request you file the same. Thank you for your assistance.

D. Conor Keys  
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**From:** [David Conor keys](#)  
**Sent:** Tuesday, June 1, 2021 10:19 AM  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132

To whom it may concern

Please find with regard to the above referenced matter Appellant's Response to Bruce Berlinsky's Motion to Intervene and well as a certificate of service for the same. I kindly request you file the same. Thank you for your assistance.

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**From:** [Court Of Appeals Filings](#)  
**Sent:** Wednesday, May 19, 2021 1:43 PM  
**To:** [David Conor keys](#); [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** David Conor keys [<mailto:conor@dconorkeyslaw.com>]  
**Sent:** Wednesday, May 19, 2021 1:02 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Michael O'Connell <[moconnell@stirlingoconnell.com](mailto:moconnell@stirlingoconnell.com)>; Kerry Koon <[kerrykoon@hotmail.com](mailto:kerrykoon@hotmail.com)>;  
[karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132

To whom it may concern

Please find with regard to the above referenced matter a copy of the Certificate of Service for the Record on Appeal. I kindly request you file the same. Thank you for your assistance.

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---

**From:** [David Conor keys](#)  
**Sent:** Tuesday, April 20, 2021 4:25 AM  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132

To Whom it may concern.

Please find with regard to the above referenced matter, Appellant's Initial Reply Brief to Inman's Response Brief and Certificate of Service. I kindly request you file the same. Thank you for your

assistance.

Sent from [Mail](#) for Windows 10

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**From:** [David Conor keys](#)  
**Sent:** Monday, April 19, 2021 11:53 PM  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132

To Whom it may concern.

Please find with regard to the above referenced matter, Appellant's Initial Reply Brief to Kennedy's Response Brief and Certificate of Service. I kindly request you file the same. Thank you for your assistance.

Sent from [Mail](#) for Windows 10

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**From:** [David Conor keys](#)  
**Sent:** Saturday, February 27, 2021 3:12 PM  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)  
**Subject:** RE: 2020-001132

To Whom it may concern.

Please find with regard to the above referenced matter, Appellant's Initial Reply Brief to Bruce A Berlinsky's Response Brief and Certificate of Service. I kindly request you file the same. Thank you for your assistance.

D. Conor Keys  
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**From:** [David Conor keys](#)

**Sent:** Tuesday, February 16, 2021 3:38 PM

**To:** [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To Whom it may concern.

Please find with regard to the above referenced matter, Appellant's Initial Reply Brief to Patricia Smith's Response Brief and Certificate of Service. I kindly request you file the same. Thank you for your assistance.

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[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

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**From:** [Court Of Appeals Filings](#)

**Sent:** Friday, January 8, 2021 8:29 AM

**To:** [David Conor keys](#); [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** David Conor keys [<mailto:conor@dconorkeyslaw.com>]

**Sent:** Thursday, January 7, 2021 9:07 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Michael O'Connell <[moconnell@stirlingoconnell.com](mailto:moconnell@stirlingoconnell.com)>; Kerry Koon <[kerrykoon@hotmail.com](mailto:kerrykoon@hotmail.com)>; [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To Whom it may concern.

Please find with regard to the above referenced matter, Appellant's Initial Brief, Designation of Matter, and Certificate of Service. I kindly request you file the same. Thank you for your assistance.

D. Conor Keys  
The Law Office of  
David Conor Keys, LLC  
PO Box 14225  
Charleston, SC 29422  
843-906-3998  
[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

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**From:** [Court Of Appeals Filings](#)

**Sent:** Thursday, October 22, 2020 10:16 AM

**To:** [David Conor keys](#); [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** David Conor keys [<mailto:conor@dconorkeyslaw.com>]

**Sent:** Thursday, October 22, 2020 9:53 AM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Michael O'Connell <[moconnell@stirlingoconnell.com](mailto:moconnell@stirlingoconnell.com)>; Kerry Koon <[kerrykoon@hotmail.com](mailto:kerrykoon@hotmail.com)>; [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To Whom it may concern.

Please find with regard to the above referenced matter, Appellant's Letter clarifying Appellant's Motion to exceed the page limitation for its initial brief. I kindly request you file the same. Thank you for your assistance.

D. Conor Keys

The Law Office of

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PO Box 14225

Charleston, SC 29422

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**From:** [Court Of Appeals Filings](#)

**Sent:** Monday, October 12, 2020 10:06 AM

**To:** [David Conor keys](#); [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** David Conor keys [<mailto:conor@dconorkeyslaw.com>]

**Sent:** Monday, October 12, 2020 9:35 AM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Michael O'Connell <[moconnell@stirlingoconnell.com](mailto:moconnell@stirlingoconnell.com)>; Kerry Koon <[kerrykoon@hotmail.com](mailto:kerrykoon@hotmail.com)>; [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To whom it may concern

Attached please find with regard to the above referenced matter, Appellant's Motion to exceed the page limitation for its initial brief. I kindly request you file the same. Thank you for your assistance.

D. Conor Keys

The Law Office of

David Conor Keys, LLC

PO Box 14225

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843-906-3998

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---

**From:** [Court Of Appeals Filings](#)

**Sent:** Monday, September 28, 2020 9:08 AM

**To:** [David Conor keys](#); [Court Of Appeals Filings](#)

**Cc:** [Michael O'Connell](#); [Kerry Koon](#); [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Due to the current emergency caused by the COVID-19 pandemic, the Court of Appeals is not accepting filing fees for extension requests. *See RE: Operation of the Appellate Courts During the Coronavirus Emergency* (S.C. Sup. Ct. Order dated March 20, 2020, amended May 29, 2020) ("While this order remains in effect, no filing fee will be required for a motion for an extension.").

If you have already mailed the fee, it will be returned to you.

Thank you.

---

**From:** David Conor keys [<mailto:conor@dconorkeyslaw.com>]

**Sent:** Sunday, September 27, 2020 11:20 AM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Michael O'Connell <[moconnell@stirlingoconnell.com](mailto:moconnell@stirlingoconnell.com)>; Kerry Koon <[kerrykoon@hotmail.com](mailto:kerrykoon@hotmail.com)>; [karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com); [Bruce@berlinskylawfirm.com](mailto:Bruce@berlinskylawfirm.com)

**Subject:** RE: 2020-001132

To whom it may concern

Attached please find with regard to the above referenced matter, Appellant's Motion for an Extension of time to file the initial brief and designation of matter. I kindly request you file the same. Thank you for your assistance.

D. Conor Keys

The Law Office of

David Conor Keys, LLC

PO Box 14225

Charleston, SC 29422

843-906-3998

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---

**From:** [David Conor keys](#)

**Sent:** Thursday, August 20, 2020 5:51 PM

**To:** [Court Of Appeals Filings](#)

**Subject:** 2020-001132

To whom it may concern

In response to the Courts letter dated 8/20/20 please find attached a letter serving court administration with the transcript request as well as a proof of service of the transcript request on court administration and all counsel of record

D. Conor Keys  
The Law Office of  
David Conor Keys, LLC  
PO Box 14225  
Charleston, SC 29422  
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[conor@dconorkeyslaw.com](mailto:conor@dconorkeyslaw.com)

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