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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Robert J. Bonds, Circuit Court Judge

Appellate Case No. 2022-000328

Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer, Appellant,

v.

DEH Disaster Recovery, LLC; Ceres Environmental Services, Inc.; Beaufort County, A Political Subdivision of the State of South Carolina; Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson; Brandi Dotson; Spencer A. Olson Trucking, LLC; Byers Products, Co.; And TruckPro, LLC, Defendants,

of which Ceres Environmental Services, Inc. and Beaufort County, A Political Subdivision of the State of South Carolina, are the Appellants-Respondents,

and Spencer A. Olson Trucking, LLC, DEH Disaster Recovery, LLC, and Ryan Colter Stoltz are the Respondents.

**APPELLANTS-RESPONDENTS CERES AND BEAUFORT COUNTY'S
RETURN TO THE MOTION OF DEH AND STOLTZ**

R. Patrick Flynn, SC Bar # 65599
Pope Flynn, LLC
P.O. Box 70
Charleston, South Carolina 29402
pflynn@popeflynn.com
Phone: (843) 834-3426
Fax: (803) 354-4899
Attorney for Appellants-Respondents

Charleston, SC

February 10, 2023

On February 2, 2023 the Appellants-Respondents Ceres and Beaufort County filed their Final Brief and Final Reply in the above-captioned matter. On February 6, 2023 the Respondents DEH and Stoltz filed a Motion to Strike those Briefs, seeking to have Ceres and Beaufort County re-file their Final Brief and Final Reply Briefs without certain changes.

Counsel for Ceres and Beaufort County communicated with Counsel for Respondents DEH and Stoltz, and those parties have agreed to resolve the Motion by Ceres and Beaufort County filing the attached Final Brief and Final Reply Brief which comply with Rule 211(b), SCACR. The Final Brief and Final Reply Brief are attached to this Return.

Counsel for Ceres and Beaufort County recognizes that when preparing final briefs, counsel inadvertently relied on an incorrect MS Word version of the Initial Reply Brief, and that resulted in differences between the Initial Reply Brief and the Final Reply Brief. That editing issue has been resolved, and the attached Final Brief and Final Reply Brief comply with Rule 211(b), SCACR.

The undersigned is standing by to provide any additional information that the Court may need, and appreciates the Court's understanding in this editing issue.

Respectfully Submitted,



February 10, 2023
Charleston, SC

R. Patrick Flynn (SC Bar # 65599)
Pope Flynn, LLC
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(843) 834-3426
Fax: (803) 354-4899
pflynn@popeflynn.com
Attorney for Appellants-Respondents