



*South Carolina*  
**DEPARTMENT OF CONSUMER AFFAIRS**  
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**PROTECTING CONSUMERS SINCE 1975**

May 5, 2023

The Honorable Jenny Abbott Kitchings  
 Clerk, South Carolina Court of Appeals  
 1220 Senate Street  
 Columbia, SC 29201

**RECEIVED**

**May 05 2023**

**SC Court of Appeals**

RE: Portfolio Recovery Associates, LLC v. Jennifer Campney  
 Appellate Case No. 2020-000935

Dear Ms. Kitchings:

During oral argument of this appeal on May 1, 2023, the Court granted the Department's request to submit supplemental citations. Please find the supplemental citations attached as page 2. Under the circumstances of this request, the Department did not reference the issue or pages of Portfolio Recovery Associates' brief to which these citations pertain. The Department, however, is certainly willing to add such references if the Court would not consider that as making an argument.

I hereby certify that I have served a copy of this letter with citations on all parties to this appeal by email only.

Best regards,

  
 Kelly H. Rainsford

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Pursuant to Rule 208(b)(7), SCACR, the Department offers the following supplemental citations without argument.

#### CASES

Barnett Bank of Marion County, N.A. v. Nelson, 517 U.S. 25 (1996)

Boerner v. LVNV Funding, LLC, 358 F.Supp.3d 767 (E.D. Wis. 2019)

Johnson v. LVNV Funding, LLC, 2016 U.S. Dist. LEXIS 19651 (E.D. Wis. 2016)

Madden v. Midland Funding, LLC, 786 F.3d 246 (2d Cir. 2015), cert. denied, Midland Funding, LLC v. Madden, 579 U.S. 927 (2016)

Meluzio v. Capital One Bank, N.A., 469 B.R. 250 (N.D. W. Va. 2012)

Meredith v. Pathfinders Detective & Recovery, Inc., 1983 U.S. Dist. LEXIS 20367 (S.C. 1983)

Quorum Fed. Credit Union v. Rumpf, 2016 Wisc. App. LEXIS 860 (Wis. Ct. App. 2016)

Satran v. LVNV Funding, LLC, 2018 U.S. Dist. LEXIS 92479 (W.D. Wis. 2018)

#### STATUTES AND REGULATIONS

S.C. Code Ann. § 37-5-108

12 U.S.C. § 25b

12 C.F.R. § 7.4008(d) and (e)

#### OTHER AUTHORITIES

Kathleen Goodpasture Smith, South Carolina Consumer Protection Code: Text with Comments, p. 303, comments 1–3 (4th ed. 2001)