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May 22 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GEORGETOWN COUNTY
COURT OF COMMON PLEAS

JOE M. CROSBY, MASTER-IN-EQUITY

APPELLATE CASE NO.: 2020-000597

CRM OF THE CAROLINAS, LLC,

v.

TREVOR W. STEEL,

Appellant,

Respondent.

APPELLANT'S PETITION FOR REHEARING

J. Clay Hopkins (SC Bar No. 102053)
clay@hopkinsfirm.com
HOPKINS LAW FIRM, L.L.C.
Post Office Box 1885
Pawleys Island, South Carolina 29585
(843) 314-4202 – Telephone
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Attorneys for Appellant

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I. APPELLANT TIMELY SERVED RESPONDENT'S COUNSEL OF RECORD WITH THE NOTICE OF APPEAL VIA EMAIL.

On April 3, 2020, Appellant filed its Notice of Appeal with the Georgetown County Clerk of Court and the South Carolina Court of Appeals. That same day, Appellant also served the Notice of Appeal via South Carolina's E-Filing system ("SCEF"). Through that system, Appellant served the Notice of Appeal electronically on two (2) separate email addresses identified as Respondent's counsel of record, with one (1) of those being identified for over two-and-a-half years.

Three (3) days later, *that same email address* requested a copy of the Notice of Appeal, and one (1) was sent less than five (5) minutes later. On appeal, for the first time in his initial brief, Respondent claims that the email address for his counsel of record was not actually the correct email address for his counsel of record, even though that email address was: (1) identified and placed in the SCEF; (2) provided to and listed with the Clerk of Court; (3) utilized by Appellant *upon Respondent's request* to electronically serve ALL documents for over two-and-a-half years, including the Notice of Appeal; (4) never removed or relieved from SCEF or the Clerk of Court; (6) never identified as an email address which was no longer valid for service in over 3 years; and (7) used to communicate throughout the underlying case and appeal. Respondent's position does not comport with reality or the undisputed facts.

Appellant filed this action on October 17, 2017. On December 1, 2017, Robert J. Moran, Jr., Esquire filed a Notice of Appearance for Respondent via SCEF. Mr. Moran filed Respondent's Answer and Counterclaim, which was served both electronically via SCEF as well as First Class U.S. Mail, respectively.

The email address provided on Mr. Moran's letterhead was mulletlaw@sc.rr.com.

(See Exhibit A). From that point forward, Appellant's counsel utilized this email address for all email communications to Mr. Moran. **(See Exhibit B).**

Sadly, on December 23, 2018 Mr. Moran passed away. On May 3, 2019, Roger Giardino, Esquire filed a Notice of Appearance for Respondent. Notably, however, Respondent never sought to relieve and/or remove Mr. Moran as counsel and every filing thereafter continued to be served on both Mr. Giardino and Mr. Moran. The email address continued to be utilized after Mr. Moran's death. In fact, after Mr. Moran's death at least two (2) emails received from the email address mulletlaw@sc.rr.com referred to a new law firm: Moran Giardino, LLC. **(See Exhibit C).** Notably, Mr. Moran's paralegal (or legal assistant), Kimberly Pringle, continued to use that email address to send and receive communications, giving all indications the law firm (and its corresponding email address) remained as counsel for Respondent.

All appearances and indications for Appellant were that service on mulletlaw@sc.rr.com was valid service under any service rule because: (1) emails continued to be sent to and from Ms. Pringle using mulletlaw@sc.rr.com after Mr. Moran's death and even up to the date this Court issued its Opinion on May 11, 2023; (2) it appeared the firm simply changed its name from Robert J. Moran, P.A. to Moran Giardino, LLC; and (3) Mr. Moran and his email address were never removed from SCEF. While Mr. Moran was undeniably deceased, his law firm and email address were still being used to send and accept service of documents both directly to and from counsel as well as through SCEF. This email address remained as an attorney of record email address throughout the case and after the underlying judgment.

While it does appear that Mr. Giardino may have provided SCEF with a different

email address for service on him, there was never any correspondence, filing, or communication advising either the Clerk of Court or Appellant's counsel that Mr. Moran's law firm or email address should be removed as appropriate service or that such service would not be effective. In fact, the opposite appeared to be the case. Even after Mr. Moran's death, there appeared to be no distinction by Respondent or his counsel between proper service on the previous email address and any other email address nor did Respondent or his counsel ever indicate anything different.

At the time the Notice of Appeal was filed with the Georgetown County Clerk of Court, through SCEF, and with the South Carolina Court of Appeals, Mr. Moran and his firm's email address were still listed as Counsel of Record for Respondent and service upon his email address was, and should be considered, valid service upon Respondent's counsel. If service upon Mr. Moran's email address was no longer valid service and no longer Respondent's counsel, the Clerk should have been advised to remove his information and the SCEF service should have been discontinued.

Is it fair that Mr. Moran's email address was desired by counsel to continue being served by the Clerk, through SCEF, as Respondent's counsel, and indicated to be good for service by the Clerk of Court, but not for Appellant's counsel? Fairness and justice demand that if the email address was utilized and constituted good service on Respondent by the Clerk of Court and SCEF, the same should hold true for Appellant's counsel. If the Clerk was not informed that only one (1) email address was sufficient for service on Respondent, how could Appellant's counsel know? Service on Mr. Moran's email address was good service for over two (2) years in this action, by undersigned counsel and the Clerk of Court, and for over one (1) year after the death of Mr. Moran,

but suddenly became ineffective service upon the appeal being filed? The time to indicate that Mr. Moran's email address was no longer valid for service was many months earlier. If this email address had no longer been used after Mr. Moran's death or if it had been removed by the Clerk this would be a different scenario, but the facts before this Court are that the same email address which had been designated as counsel of record for Respondent was used continuously throughout the litigation without complaint or objection until a hard copy of the Notice of Appeal was served late, at which time (and for the first time) that email address was no longer an appropriate email address for counsel of record.

Respondent should be estopped from denying that the email address which had served as the email for counsel of record for more than two (2) years was suddenly *not* a correct email for counsel of record only after a Notice of Appeal was filed and served upon him. This sudden change in position (and practice) would constitute a manifest injustice. The Court failed to consider all the facts and circumstances in determining the email service of the Notice of Appeal to the email address mulletlaw@sc.rr.com on April 6, 2020 was not valid service. Specifically, the Court failed to note that the email address to which the Notice of Appeal was directly served was and had been the email address for counsel of record, listed with SCEF and the Clerk, for more than (2) years when served, never removed or relieved, never in any other way indicated it was no longer good service, and continued to be used by and for the law firm representing Respondent throughout the litigation and appeal.

II. ELECTRONIC SERVICE VIA EMAIL BY SOUTH CAROLINA COURT E-FILING SYSTEM SATISFIED THE SERVICE REQUIREMENT.

In the event the Court determines that service by email upon the email address

identified as counsel of record in the action for over two (2) years was not valid service, Appellant asserts that electronic service through SCEF upon **both** email addresses identified as counsel of record constituted proper service of the Notice of Appeal. The South Carolina Electronic Filing Policies and Guidelines further supports Appellant's position of timely service. Specifically, Section 4(e), titled Electronic Service, specifically addresses the issue. Section 4(e)(3) provides:

Service of a pleading, motion, or other paper by NEF subsequent to the summons and complaint or other filing initiating a case is complete at the time of the submission of the pleading, motion or other paper for E-Filing, provided a NEF is transmitted by the E-Filing system in accordance with (e (2) of this Section. The act of E-Filing the pleading, motion or other paper is the equivalent of depositing it in the United States Mail under Rule 5(b)(1), SCRPC. The NEF constitutes proof of service under Rule 5(b), SCRPC, and the date of service shall be the date stated in the NEF as the "Official File Stamp." Where notice of the filing of a pleading, motion or other paper is served by a NEF, the E-Filer need not file proof of service, but the E-filer must retain a copy of the NEF as proof of service.

(emphasis added).

Thus, pursuant to the E-Filing guidelines, the Notice of Appeal was deemed served electronically (via email) to both of Respondent's counsel's email addresses on April 3, 2020 and the NEF constituted proof of service. A Notice of Appeal can be served on opposing counsel via e-mail. Section (g)(3), *RE: Operation of the Appellate Courts During the Coronavirus Emergency*. Pursuant to the clear language of the E-Filing Policies and Guidelines, submission of the Notice of Appeal via e-filing was the "equivalent of depositing it in the United States Mail . . ." The language of the policy is clear. Respondent's counsel does not dispute service or contend he did not get the Notice of Appeal. Rather, the argument is that he did not receive a "hard copy" until after the deadline. A hard copy is not and was not required. He was served via e-filing pursuant to

the Supreme Court's e-filing policies. Even if providing a copy directly to the email address of Respondent's other counsel of record was not sufficient service, which it was, service was perfected by submitting the document to the e-filing system to both email addresses. The argument that counsel was not properly served with the Notice of Appeal in accordance with the rules does not follow, and, in fact, contradicts, the plain language of the Supreme Court's e-filing policy. Respondent's counsel was served with the Notice of Appeal via email on two (2) separate occasions, first via the e-filing system pursuant to the Court's e-filing policy which was served on both counsel's email addresses, and, second, by a direct email to the email address of counsel of record that was designated to the Court for over two (2) years.

This Court has found that Mr. Giardino was also served with the Notice of Appeal through SCEF, which he does not deny, yet finds that such service was ineffective or did not satisfy the service by email rule. Specifically, this Court held ". . . service on opposing counsel pursuant to the SCEF protocols is not effective to confer appellate jurisdiction on this court."

Yet there appears to be nothing in South Carolina Appellate Court Rule 203(b), or any other appellate court rule, or the e-filing policies and guidance requiring that email service of a notice of appeal come directly from opposing counsel rather than through the e-filing system. Nothing in the South Carolina Appellate Court Rules or the Supreme Court's March 20, 2020 Order *RE: Operation of the Appellate Courts During the Coronavirus Emergency* prohibits email service of the Notice of Appeal through the SCEF. In fact, the e-filing policies and guidelines specifically provide that such electronic service is deemed as if put in the mail. It is undisputed that Respondent's counsel was

served with the Notice of Appeal via email through the SCEF, just not directly from counsel's server. There is no rule requiring or dictating the source of the electronic service of the Notice of Appeal. The Notice did come from Appellant's counsel, just through a different email system. This is a distinction without a difference. Counsel has presented no evidence that he was not served or did not receive the Notice of Appeal via email on April 3, 2020. In the absence of such evidence, the effort to dismiss the appeal must fail. *See, Lemmons v. Maced. Water Works, Inc.*, 431 S.C. 186, 847 S.E.2d 471 (Ct. App. 2020).

Appellant submits that service of the Notice of Appeal via email was perfected on Respondent's counsel of record email addresses on April 3, 2020 via the submission of the document to SCEF and confirmed by the NEF. The Court erred in placing a requirement not found in the rules or Supreme Court Order on the form of email service, or which server or medium must be used.

III. THE NOTICE OF APPEAL WAS TIMELY SERVED VIA FIRST CLASS U.S. MAIL IN ADDITION TO E-MAIL.

Even if service by email upon counsel of record's email address was not perfected by both the SCEF filing through the Court in compliance with the E-filing policies and/or by direct email to the long-standing email address of counsel of record in the case, both of which Appellant's counsel submits perfected service of the Notice of Appeal, the Court should deem the service by First Class U.S. Mail to be timely. Although Respondent's counsel of record had already been served electronically through the SCEF system and direct email, out of an abundance of caution yet another copy was served via regular postal mail. Unfortunately, as can be seen on the Certificate of Service with the Notice of Appeal, the mailing address for Respondent's counsel had an incorrect Post Office Box

number because of a typographical (or scrivener's) error. Per the Certificate of Service, the Notice of Appeal was served on April 6, 2020 (seven (7) days before the deadline to appeal) to Respondent's counsel at "Post Office Box 4416" in Pawleys Island, South Carolina. The actual mailing address for Respondent's counsel is "Post Office Box 4413" in Pawleys Island, South Carolina. Despite the fact the document was mailed from Pawleys Island to a Pawleys Island post office box in the same post office, it was not returned until nine (9) days later. The document was returned to Appellant's counsel and counsel served the document via mail at the correct address the same date it was received from the U.S. Post Office (i.e., April 15, 2020), which would have been two (2) days late had it not been previously served via email.

To find that the Notice of Appeal was not timely served where service by mail was attempted seven (7) days before the deadline but was sent to the wrong post office box due to a typographical or scrivener's error, and the post office taking nine (9) days to return it while being in the same Post Office, is placing form over substance. While this Court has historically strictly interpreted statutes and rules governing the service of a notice of appeal, it has also recognized it should not put form over substance.

In the unpublished opinion of *In re Estate of Deas*, Appellate Case No. 2013-000550, No. 2015-UP-059, this Court recognized form should not supplant substance. In *Deas*, there was no dispute that the notice of appeal from the probate court's decision was not timely filed in the Clerk of Court's office, despite counsel's best efforts. Under a strict interpretation of the governing statute, the appeal could have been dismissed as there was no doubt the notice was not timely filed with the Clerk of Court. Considering the circumstances, however, of counsel's timely efforts and the post office's possible

mishandling or delay in getting the notice to the Clerk's office, this Court found that dismissing the appeal would "elevate form over substance".

Also, in *City of Orangeburg v. Edwards*, 277 S.C. 355, 271 S.E.2d 314 (1980), the Court found that service of a notice of appeal served on a party's attorney rather than the party directly did not comply with the statute. Justices Ness wrote a dissenting opinion, in which Justice Littlejohn concurred, stating that the overly strict interpretation of the statute placed form over substance. As the dissent noted, "[T]he sole purpose of a notice of appeal is to inform the court and the opposing party that the appealing party is dissatisfied with and intends to appeal the decision rendered." No case has held otherwise since. As this Court found in *Deas*, "[T]he real purpose of the [General Assembly] will prevail over the literal import of the words." (citing *Liberty Mutual Ins. Co. v. S.C. Second Injury Fund*, 318 S.C. 516, 518, 458 S.E.2d 550, 551 (1995) and *S.C. Second Injury Fund v. Am. Yard Prods.*, 330 S.C. 20, 23-24, 496 S.E.2d 863, 863-64 (1998)).

The purpose of the notice of appeal was met here where the Court and the opposing party (counsel) were timely informed of the intent to appeal the decision. The fact the notice of appeal was timely received by counsel is not even denied or in dispute. Certainly, form should not trump substance where the General Assembly's purpose has undoubtedly been met.

Likewise, in *Wells Fargo Bank, N.A. v. Fallon Prods.*, 422 S.C. 211, 810 S.E.2d 856 (2018), the South Carolina Supreme Court held that receipt of an email by an *attorney of record* providing notice of entry of an order will trigger the time to file and serve a notice of appeal. The holding did not specify that receipt must be at or by any particular email address or through any particular channel or email medium. The holding did not

differentiate or draw a distinction between SCEF and direct email or email from an attorney, the Court, or an assistant. If receipt of such an email by an attorney of record can constitute notice triggering the time for an appeal, then certainly receipt of an e-mail with a notice of appeal by an attorney of record, at a known and long-established email address, satisfies the notice requirement and the General Assembly's purpose of the notice of intent to appeal.

Furthermore, even though the Court held that the time to appeal was triggered by the attorney of record's receipt of an email noticing entry of an order, it found that "fairness dictates that our holding on this issue be applied prospectively . . ." Thus, fairness must, and historically has, play a role in the evaluation and analysis of whether a notice of appeal has been timely served.

The Court placed form over substance, interpreted the rule too strictly, and disregarded fairness, as well as ignoring precedent, in determining the service of the Notice of Appeal by First Class U.S. Mail was late.

CONCLUSION

Based on the foregoing, Appellant respectfully requests the Court rehear and reconsider its Opinion issued May 11, 2023 dismissing the appeal for failure to timely serve it, and to consider the merits of the appeal, including the briefs and oral argument, and rule accordingly.

HOPKINS LAW FIRM, L.L.C.



J. Clay Hopkins (SC Bar No. 102053)

clay@hopkinsfirm.com

Post Office Box 1885

Pawleys Island, South Carolina 29585

(843) 314-4202 – Telephone

(843) 314-9365 - Facsimile

ATTORNEYS FOR APPELLANT

Pawleys Island, South Carolina
May 22, 2023

Other Counsel of Record:

Roger P. Giardino, Esquire
Attorney at Law
Post Office Box 4413
Pawleys Island, SC 29585
(843) 314-4321

Attorney for Respondent

EXHIBIT A

Robert J. Moran, PA
Attorneys-at-Law
Post Office Box 370
Murrells Inlet, South Carolina 29576
Telephone: (843) 237-4533 E-Mail: Mullettlaw@sc.rr.com Facsimile: (843) 237-3163

December 1, 2017

William E. Hopkins, Jr.
PO box 1885
Pawleys Island, S.C. 29585

Re: CRM of the Carolinas, LLC v. Trevor Steel
2017-CP-22-00856

Dear Mr. Hopkins:

Enclosed please find served upon you the Defendant's Answer and Counterclaim in regards to the above referenced action, as well as a Certificate of Mailing of the same.

Sincerely,



Kimberly Pring

/kp

Enclosures as stated above

Ec: client

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DEC 04 2017

EXHIBIT B



HOPKINS
LAW FIRM
PRINCIPLED PRACTICAL PERSONAL

15

Sent: Bill Hopkins
Monday, November 6, 2017 9:48 AM
To: mulletlaw@sc.rr.com
Subject: Temporary Injunction Order
Attachments: Temporary Injunction Order.docx

Hey Bob, hope you had a nice weekend. Here is the proposed Order for your review.

William E. Hopkins, Jr.
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
bill@hopkinsfirm.com

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Bill Hopkins

From: Hennigar, Leslie <lhennigar@hsblawfirm.com>
Sent: Monday, November 19, 2018 10:28 AM
To: mulletlaw@sc.rr.com; Kathy Roberts; Bill Hopkins
Subject: Confirming mediation CRM of the Carolinas v Trevor Steel scheduled for Nov 28 at Mr. Moran's office on Pawleys Island please (7017-3260)

HAYNSWORTH SINKLER BOYD

Leslie F. Hennigar | Legal Secretary
Direct 843.720.4402 | lhennigar@hsblawfirm.com

Haynsworth Sinkler Boyd, P.A.
134 Meeting Street, 3rd Floor | Charleston, SC 29401
Main 843.722.3366 | Fax 843.722.2266

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EXHIBIT C

Bill Hopkins

From: Kimberly Pring <mullettlaw@sc.rr.com>
Sent: Tuesday, August 20, 2019 7:59 AM
To: Kathy Roberts; 'Donna Gray'; Bill Hopkins; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane'
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good Morning

Roger is available on this day as well. I am assuming since it is Columbus day that the Court house will be open anyway.

Kimberly Pring
Moran Giardino, LLC
843-237-4533/843-314-4321

From: Kathy Roberts [mailto:kathy@hopkinsfirm.com]
Sent: Monday, August 19, 2019 3:19 PM
To: Donna Gray; Bill Hopkins; 'Giardinolaw@gmail.com'
Cc: mullettlaw@sc.rr.com; Lucinda Lesane
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Works for us. Thanks Donna!

Take care - Kathy



Kathryn Y. (Kathy) Roberts
Litigation Paralegal
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Post Office Box 1885
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
kathy@hopkinsfirm.com

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From: Donna Gray <degray@crosbyfirm.com>
Sent: Tuesday, August 20, 2019 9:34 AM
To: Kimberly Pring <mullettlaw@sc.rr.com>; Kathy Roberts <kathy@hopkinsfirm.com>; Bill Hopkins <bill@hopkinsfirm.com>; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane' <llesane@gtcounty.org>
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good morning,

Yes the courthouse is open Columbus day. I will calendar for this date and time so please mark your calendars. Also, reminder that we do not provide a court reporter so if you need one you will have to get one. Thanks.

From: Kimberly Pring [<mailto:mullettlaw@sc.rr.com>]
Sent: Tuesday, August 20, 2019 7:59 AM
To: 'Kathy Roberts'; Donna Gray; 'Bill Hopkins'; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane'
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good Morning

Roger is available on this day as well. I am assuming since it is Columbus day that the Court house will be open anyway.

Kimberly Pring
Moran Giardino, LLC
843-237-4533/843-314-4321

From: Kathy Roberts [<mailto:kathy@hopkinsfirm.com>]
Sent: Monday, August 19, 2019 3:19 PM
To: Donna Gray; Bill Hopkins; 'Giardinolaw@gmail.com'
Cc: mullettlaw@sc.rr.com; Lucinda Lesane
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Works for us. Thanks Donna!

Take care - Kathy



Kathryn Y. (Kathy) Roberts
Litigation Paralegal
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Post Office Box 1885
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
kathy@hopkinsfirm.com

Bill Hopkins

From: mulletlaw@sc.rr.com
Sent: Monday, October 14, 2019 7:12 PM
To: Bill Hopkins
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Thank you very much. Have a great evening.

Kimberly Pring

Moran Giardino LLC

From: "Bill Hopkins"
To: "Kimberly Pring", "Kathy Roberts"
Cc:
Sent: Monday October 14 2019 7:01:12PM
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Fine by me, thanks Roger.



William E. Hopkins, Jr.
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Pawleys Island, SC 29585
Telephone: (843) 314-4202
Facsimile: (843) 314-9365
bill@hopkinsfirm.com

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From: Kimberly Pring <mullettlaw@sc.rr.com>
Sent: Monday, October 14, 2019 2:15 PM
To: Kathy Roberts <kathy@hopkinsfirm.com>; Bill Hopkins <bill@hopkinsfirm.com>
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Good Afternoon

I have attached a proposed order in regards to the Temporary Injunction in the above referenced action. Please review and let me know if you would like any changes.

Kimberly Pring
Moran Giardino LLC
PO Box 4413
Pawleys Island, SC 29585
843-237-4533/843-314-4321

From: Kathy Roberts [<mailto:kathy@hopkinsfirm.com>]
Sent: Tuesday, August 20, 2019 10:20 AM
To: Donna Gray; Kimberly Pring; Bill Hopkins; Giardinolaw@gmail.com
Cc: 'Lucinda Lesane'
Subject: RE: 2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel

Thanks Donna. We will arrange for a court reporter.

Take care - Kathy



Kathryn Y. (Kathy) Roberts
Litigation Paralegal
HOPKINS LAW FIRM, LLC
12019 Ocean Highway
Post Office Box 1885
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May 22 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
COURT OF COMMON PLEAS

MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

APPELLATE CASE NO.: 2020-000614

CRM OF THE CAROLINAS, LLC,

Appellant,

v.

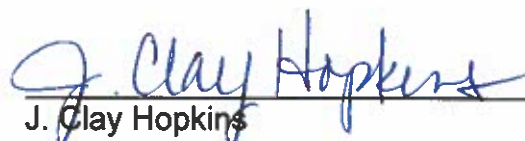
TREVOR W. STEEL,

Respondent.

PROOF OF SERVICE

I, J. Clay Hopkins, Esquire hereby certify that on May 22, 2023, I caused a true and correct copy of **Appellant's Petition for Rehearing** in the above captioned action to be served on counsel of record via email and U.S. Mail, postage pre-paid, addressed as follows:

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Pawleys Island, SC 29585
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J. Clay Hopkins

Charleston, South Carolina