

RECEIVED

May 26 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,

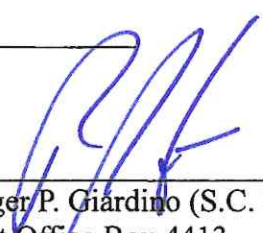
APPELLANT,

v.

TREVOR W. STEEL,

RESPONDENT.

RESPONDENT'S RETURN TO APPELLANT'S  
PETITION FOR REHEARING

  
\_\_\_\_\_  
Roger P. Giardino (S.C. Bar 74478)  
Post Office Box 4413  
Pawleys Island, S.C. 29585  
843-314-4321  
Attorney for Respondent

Opposing Counsel

J. Clay Hopkins  
Hopkins Law Firm, LLC  
171 Church Street, Suite 160  
Charleston, South Carolina 29401

And

12019 Ocean Highway  
PO Box 1885  
Pawleys Island, SC 29585  
Attorney for Appellant

## TABLE OF CONTENTS

Table of Authorities.....	ii
Arguments	
I. APPELLANT FAILED TO TIMELY SERVE RESPONDENT’S COUNSEL OF RECORD WITH THE NOTICE OF APPEAL VIA EMAIL. ....	2
II. ELECTRONIC SERVICE VIA EMAIL BY THE SOUTH CAROLINA COURT E-FILING SYSTEM DOES NOT SATISFY THE SCACR SERVICE REQUIREMENT .....	5
III. APPELLANT FAILED TO SERVE THE NOTICE OF APPEAL VIA FIRST CLASS U.S. MAIL IN ADDITION TO E-MAIL.....	7
Conclusion.....	9

**TABLE OF AUTHORITIES**

**CASES**

*Elam v. S.C. Dep't of Transp.*, 361 S.C. 9, 602 S.E.2d 772 (2004).....4,8  
*Wells Fargo Bank, N.A. v. Fallon Properties South Carolina, LLC*, 422 S.C. 211, 810 S.E.2d 856 (2017) .....5, 8  
In re Estate of Deas, Opinion No. 2015-UP-059 .....7  
*Lemmons v. Maced Works, Inc.*, 431 S.C. 86, 847 S.E. 2d 471 (S.C. App. 2020) ..... 8  
*Liberty Mutual Ins. Co. v. S.C. Second Injury Fund*, 318 S.C. 516, 458 S.E. 2d 550 (1985) .... 8  
*S.C. Second Injury Fund v. Am. Yard Prods.*, 330 S.C. 20, 496 S.E. 2d 863 (1998) ..... 8

**RULES**

South Carolina Appellant Court Rule 240(e) .....1  
South Carolina Appellant Court Rule 203(b)(1) ..... 4  
Section (g)(3) Re: Operation of the Appellate Courts During the Coronavirus Emergency (March 20, 2020) .....6

Pursuant to the South Carolina Appellate Court Rule 240(e), Roger Philip Giardino, Jr., Attorney for Respondent hereby submits this Return in Opposition to Appellants, CRM of the Carolinas, LLC Petition for Rehearing. For the reasons to follow, the Court should deny the Petition.

## **BACKGROUND**

The Master-in-Equity Joe M. Crosby electronically filed his order with the Georgetown County circuit court on March 12, 2020. According to the applicable SCACR, Appellant concedes the deadline for serving the notice of appeal on Respondent was Monday, April 13, 2020; as the thirtieth day fell on the preceding Saturday, April 11, 2023. On April 3, 2020, Appellant electronically filed the notice of appeal with the Georgetown County circuit court and received an automated reply from [efiledonotreply@sccourts.org](mailto:efiledonotreply@sccourts.org) acknowledging the filing and stating that two named attorneys representing Respondent, Robert J. Moran, Jr. and Roger Philip Giardino, Jr. had been served electronically.

On April 6, 2020, Kathy Roberts, paralegal for Appellant's counsel, sent via email from her email address, [kathy@hopkinsfirm.com](mailto:kathy@hopkinsfirm.com), a copy of the Notice of Appeal in PDF format to Kimberly Pring, at [mulletlaw@sc.rr.com](mailto:mulletlaw@sc.rr.com), paralegal for Respondent's counsel. Additionally, the Appellant counsel's paralegal executed a certificate of service stating that she had "caused a . . . copy of the notice of appeal . . . to be served on all counsel of record via regular U.S. Mail, postage pre-paid, addressed" to Respondent's counsel. However, said envelope containing the copy of Notice of Appeal was addressed to "Post Office Box 4416" and also listed on the certificate of service, also as 4416; which was incorrect because the Post Office Box number of Respondent's counsel is actually 4413 (in addition, Respondent's counsel name was also misspelled on the certificate). Therefore, this particular copy of the notice of appeal was returned to Appellant's

counsel on April 15, 2020, and Appellant's counsel mailed another copy to opposing counsel on the following day,

**I. APPELLANT FAILED TO TIMELY SERVE RESPONDENT'S COUNSEL OF RECORD WITH THE NOTICE OF APPEAL VIA EMAIL.**

It appears Appellant either has a genuine mistake of fact, conflates and or is disingenuous in its contention that Appellant timely served Respondent's counsel of record with the Notice of Appeal via email. Respondent initially engaged Attorney Robert J. Moran, Jr. to represent him in the underlying proceedings with Appellant commenced on October 17, 2017. Attorney Moran filed a Notice of Appearance for Respondent electronically via the South Carolina's E-Filing System ("SCEF") on December 1, 2017; and subsequently filed Respondent's Answer and Counterclaim also by SCF, as well as First Class U.S. Mail. SCEF served electronically "Robert J. Moran, Jr. for Trevor W. Steel" and "William E. Hopkins, Jr., for CRM of the Carolinas LLC." Please see attached **Exhibit A**. The SCEF email was addressed to Attorney Moran's AIS authorized primary email: [mulletlaw@aol.com](mailto:mulletlaw@aol.com).

On October 10, 2018, Appellant's counsel of record at that time drafted and sent a letter to the Georgetown County Clerk of Court addressing this matter as it appeared on the ADR Sanctions Roster scheduled for Thursday, October 11, 2018. Attorney Moran received electronic notification from SCEF to his AIS authorized primary email address: [mulletlaw@aol.com](mailto:mulletlaw@aol.com); please see attached **Exhibit B**.

During the pendency of litigation, but prior to trial, Robert J. Moran, Jr., Esq. passed away on December 23, 2018. Please see the redacted copy of Death Certification attached as **Exhibit C**; the original is filed in the Georgetown County Probate Court Case Number 2019-GS-22-00105. On December 27, 2018, Cindy Howard, Family Court Supervisor, for the Office of the Georgetown County Clerk of Court, emailed the members of the Georgetown and Horry County Bars notifying

Attorney Moran's colleagues of his passing. Attorney William E. Hopkins, Jr. is listed on the email distribution list as a recipient. Please see **Exhibit D**.

On January 29, 2019, Appellant's attorney of record at the time sent a letter to the Georgetown County Common Pleas Court Coordinator and Supervisor concerning the status of this lawsuit and advising of Attorney Moran's death. A copy of the letter was served electronically on Attorney Moran as per the SCEF notification sent to his AIS authorized primary email: **mullettlaw@aol.com**; please see **Exhibit E**.

Thereafter, on May 3, 2019, Respondent retained his current counsel and Roger Philip Giardino, Jr., Esq. electronically entered a Notice of Appearance. SCEF sent a "Received Notice" and "Accept Notice" to Respondent counsel's AIS authorized primary email: **giardinolaw@gmail.com**; please see **Exhibit F**. On the same day, Respondent's counsel also electronically filed a Proposed Order/Referred to Master of Special Referee; SCEF electronically served following people: Robert J. Moran, Jr., William E. Hopkins, Jr. and Roger Philip Giardino, Jr. Respondent's counsel received the appropriate NEF sent by SCEF via email to **giardinolaw@gmail.com**; please see **Exhibit G**. Three days later, on May 6, 2019, the Honorable Benjamin H. Culbertson electronically executed said Proposed Order and SCEF electronically served following people: Robert J. Moran, Jr., William E. Hopkins, Jr. and Roger Philip Giardino, Jr. Respondent's counsel received the appropriate NEF sent by SCEF via email to **giardinolaw@gmail.com**; please see **Exhibit H**.

On the day of trial, Master Crosby issued a partial order for this matter concerning an issue not before this Court on appeal. SCEF served the deceased Robert J. Moran, Jr., William E. Hopkins, Jr. and Roger Philip Giardino, Jr. Respondent's counsel received the appropriate NEF sent by SCEF via email to **giardinolaw@gmail.com**; please see **Exhibit I**.

Then, on March 4, 2020, when Master Crosby issued his Order the SCEF again served the deceased Robert J. Moran, Jr., William E. Hopkins, Jr. and Roger Philip Giardino, Jr., Respondent's counsel received the appropriate NEF sent by SCEF via email to [giardinolaw@gmail.com](mailto:giardinolaw@gmail.com); please see **Exhibit J**. Appellant never utilized any of the available post judgment relief options afforded before the lower court after Master Crosby's issuance of his Final Order. Rather, Appellant elected to file a Notice of Appeal but failed to properly serve Respondent. "A notice of appeal shall be served on all respondents within thirty (30) days after receipt of written notice of entry of the order or judgment." Rule 203(b)(1), SCACR. "The requirement of service of the notice of appeal is jurisdictional, i.e., if a party misses the deadline, the appellate court lacks jurisdiction to consider the appeal and has no authority or discretion to 'rescue' the delinquent party by extending or ignoring the deadline for service of the notice." *Elam v. S.C. Dep't of Transp.*, 361 S.C. 9, 14–15, 602 S.E.2d 772, 775 (2004).

Inexplicably, SCEF continued to serve documents pertaining to this lawsuit on Attorney Moran by way of email well after his passing on December 23, 2018, even after the Georgetown County Court System, and most importantly, Appellant's counsel of record recognized Attorney Moran's death. However, Appellant's counsel clearly misstates in the Petition for Rehearing that Respondent's counsel and the Clerk of Court failed to provide the proper AIS primary email for Attorney Giardino. First, the Georgetown County Common Pleas Supervisor sent an email on June 3, 2019, one month after Attorney Giardino entered Notice of Appearance in this matter, to the AIS primary email addresses for the only two living attorneys of record for the parties, William E. Hopkins, Jr. and Roger Philip Giardino, Jr.; please see **Exhibit K**. Then Respondent's counsel sent an email to Appellant's counsel of record at the time prior to trial on September 25, 2019, and

then again post-trial on January 31, 2020, concerning review of the proposed Final Order; please see **Exhibit L**.

By Appellant's admission and omission, in its Petition for Rehearing, Appellant states that emails were sent to only [mulletlaw@sc.rr.com](mailto:mulletlaw@sc.rr.com); and not to [mulletlaw@aol.com](mailto:mulletlaw@aol.com) and/or [giardinolaw@gmail.com](mailto:giardinolaw@gmail.com) the recognized AIS primary email addresses for the Respondent's attorneys of record over the pendency of this litigation.

## **II. ELECTRONIC SERVICE VIA EMAIL BY THE SOUTH CAROLINA COURT E-FILING SYSTEM DOES NOT SATISFY THE SCACR SERVICE REQUIREMENT.**

Appellant relies on conjecture and surmise rather than evidentiary proof of compliance to incorrectly assert that electronic service via email by SCEF satisfied the service requirement to establish appellate jurisdiction. Appellant reliance on the SCEF generated notifications fails to reconcile the controlling service of notice requirements as set forth by the SCACR which unilaterally govern the filing and service of a notice of appeal. The sole method of electronic service under these rules is by email. See *Wells Fargo Bank, N.A. v. Fallon Properties S.C., LLC*, 422 S.C. 211, 215, 810 S.E.2d 856, 858 (2018) (stating that the South Carolina Appellate Rules, rather than the South Carolina Rules of Civil Procedure, govern issues concerning appellate procedure). More importantly, Attorney Moran's AIS primary email address is a red herring in Appellant's argument, as Appellant's counsel knew, or should have known, the two most important facts about Respondent's attorneys of record at the time of filing and serving Appellant's Notice of Appeal: 1. that Attorney Moran previously died well before trial; and 2. the AIS primary email for Respondent's remaining/living attorney of record was, as still is, [giardinolaw@gmail.com](mailto:giardinolaw@gmail.com). Respondent counsel's primary email address is the linchpin of this matter as under SCACR, electronic service of a copy of the notice of appeal is effective only when

it is sent to opposing counsel's primary e-mail address listed in AIS. See Section (g)(3), *RE: Operation of the Appellate Courts During the Coronavirus Emergency* (March 20, 2020) ("During the Coronavirus] emergency, this Court authorizes a lawyer admitted to practice law in this state to serve a document on another lawyer admitted to practice law in this state using the lawyer's primary e-mail address listed in the [AIS]."). Since the SCACR govern service of notice of appeal, service on opposing counsel solely by adhering to the SCEF protocols is not effective to confer appellate jurisdiction on this Court.

Appellant fails to put forth any proof in its Petition for Rehearing establishing Appellant counsel complied with the SCACR concerning service of the Notice of Appeal. There is not a scintilla of evidence indicating Appellant's counsel of record sent any emails concerning the service of the Notice of Appeal to [mullettlaw@aol.com](mailto:mullettlaw@aol.com) and/or [giardinolaw@gmail.com](mailto:giardinolaw@gmail.com); the recognized AIS primary email addresses for Respondent's only attorneys of record over the pendency of this litigation.

Finally, the email address [mullettlaw@sc.rr.com](mailto:mullettlaw@sc.rr.com) belongs to, and is solely utilized by Kimberly Pring, paralegal to Attorney Moran for over 15 years. Ms. Pring is not an attorney, nor has the email address [mullettlaw@sc.rr.com](mailto:mullettlaw@sc.rr.com) ever been listed as the AIS primary email address for any attorney, let alone an attorney admitted to practice law within the State of South Carolina. Again, Appellant fails to proffer any proof of compliance with the applicable rules requiring an email concerning service of the Notice of Appeal from a South Carolina licensed attorney to a recipient who is similarly a South Carolina licensed attorney. Ms. Pring retained her own email address when she came to work for Respondent's counsel after Attorney Moran's death in December 2018.

### III. APPELLANT FAILED TO SERVE THE NOTICE OF APPEAL VIA FIRST CLASS U.S. MAIL IN ADDITION TO E-MAIL.

Appellant speciously argues that it properly and timely served the Notice of Appeal via First Class U.S. Mail in addition to properly serve via e-mail said notice in compliance with the applicable rules and procedure. However, the Record on Appeal is void of any evidence establishing that the Appellant properly served the Respondent with the Notice of Appeal via First Class U.S. Mail. In fact, the Record on Appeal illustrates conversely that the Appellant failed to properly serve the Respondent with the Notice of the Appeal via First Class U.S. Mail as the only exhibit contained therein is a copy of an envelope purported to contain the Notice of Appeal properly addressed to Respondent's counsel postmarked by the U.S. Postal Service on April 16, 2020; three days after the period of time to effectuate proper service expired.

Appellant fails to address in its reliance on *In re Estate of Deas*, Appellate Case No. 2013-000550, No. 2015-UP059 the key differences between the fact patterns of that case and this one before this Court. In *Deas*, the court distinguished between an error by the litigant, or party's attorney, and that of a possible unrelated third party. Here, the lack of service of the notice of appeal lays entirely on the Appellant for mailing the initial attempt of service to a wrong address. Appellant erred, causing service not to be properly effectuated in a timely manner. There was not another possible intervening force from the outside that caused the mailing to go astray; no Act of God, nor malfeasance by a carrier. The letter failed to reach its intended destination due to an incorrect address attributed to Appellant.

Interestingly, although Appellant argues to equate a similar, but different email address ([mullettlaw@sc.rr.com](mailto:mullettlaw@sc.rr.com)) belonging to, and associated with, a non-attorney to that of a deceased member of the South Carolina Bar AIS primary email address ([mullettlaw@aol.com](mailto:mullettlaw@aol.com)), Appellant

failed, or elected not to attempt to effectuate service via First Class U.S. Mail by sending the Notice of Appeal to the address contained on the Answer with Counterclaim filed by Attorney Moran.

Appellant relies on *Lemmons v. Maced Water Works, Inc.*, 431 S.C. 186, 847 S.E.2d 471 (S.C. App. 2020), *Liberty Mutual Ins. Co. v. S.C. Second Injury Fund*, 318 S.C. 516, 458 S.E.2d 550 (1985), and *SC Second Injury Fund v. Am. Yard Prods.*, 330 S.C. 20, 496 S.E. 2d 863 (1998) yet fails to conform the circumstances before this Court to comply with *Wells Fargo Bank, N.A. v. Fallon Props*, 422 S.C. 211, 810 S.E. 2d 856 (2018); instead arguing substance over form rather than compliance. Throughout the pendency of this litigation, counsels acted collegially while advocating for their respective clients; with each readily responding to each other and even offering an unsolicited reminder when an answer on the counterclaim due on the eve of trial. Appellant's position as detailed in the Petition seems to purport Respondent counsel's actions as surreptitious, done so to manipulate the rules of procedure and create a ruse before this Court. Such allegations are baseless and without merit.

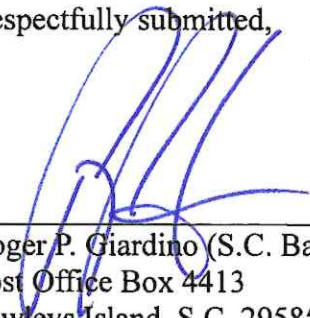
Based on the foregoing, Appellant effectuated neither timely service by regular mail nor electronic service in the manner required by the rules binding this Court. Therefore, this Court does not have appellate jurisdiction over this matter and its prior dismissal must stand. See *Elam*, 361 S.C. at 14–15, 602 S.E.2d at 775 ("The requirement of service of the notice of appeal is jurisdictional, i.e., if a party misses the deadline, the appellate court lacks jurisdiction to consider the appeal and has no authority or discretion to 'rescue' the delinquent party by extending or ignoring the deadline for service of the notice."). In addition, even in the event that Appellant establishes the notice sent to a non-attorney email address of **mulletlaw@sc.rr.com** suffices the SCACR requirements, Respondent's counsel failed to locate and/or discover any rule, statute, precedent, or even dicta, establishing that service made by: (i) court mandated acceptable email

means; and/or, (ii) First Class U.S. Mail on a known deceased counsel conferred appellate jurisdiction on the other remaining parties to a lawsuit.

### CONCLUSION

Therefore, based on the foregoing, and in conjunction with the pertinent parts of the Record on Appeal and positions raised by counsel at Oral Argument, Respondent respectfully prays for this Court to deny Appellant's Petition for Rehearing.

Respectfully submitted,



---

Roger P. Giardino (S.C. Bar 74478)  
Post Office Box 4413  
Pawleys Island, S.C. 29585  
843-314-4321  
Giardinolaw@gmail.com  
Attorney for Respondent

May 26, 2023  
Pawleys Island, SC

Courtesy NEF RE: 2017CP2200856

From: efiledonotreply@sccourts.org

To: mullettlaw@aol.com

Cc: mullettlaw@sc.rr.com

Date: Friday, December 1, 2017 at 11:23 AM EST

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 12-01-2017 11:23:07 AM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Llc VS Trevor W Steel  
**Document(s) Submitted:** Service/Certificate Of Service  
**Filed by or on behalf of:** Robert J. Moran, Jr.

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

Robert J. Moran, Jr. for Trevor W Steel  
William E. Hopkins, Jr. for Crm Of The Carolinas Llc

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

---- 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.

EXHIBIT A

Courtesy NEF RE: 2017CP2200856

From: efiledonotreply@sccourts.org

To: mullettlaw@aol.com

Cc: mullettlaw@sc.rr.com

Date: Wednesday, October 10, 2018 at 08:19 AM EDT

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 10-10-2018 08:19:28 AM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Llc VS Trevor W Steel  
**Document(s) Submitted:** Letter/Letter  
**Filed by or on behalf of:** William E. Hopkins, Jr.

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

Robert J. Moran, Jr. for Trevor W Steel  
William E. Hopkins, Jr. for Crm Of The Carolinas Llc

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

--- 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.

**EXHIBIT B**

DEATH CERTIFICATION

STATE FILE NUMBER: 139-18-048534

DECEDENT'S NAME: \*ROBERT JOSEPH MORAN JR\*

AKA's: NA

ARMED FORCES: NO

DATE OF BIRTH: JANUARY 08, 1951

TYPE OF PLACE OF DEATH: DECEDENT'S HOME

NAME AND ADDRESS OF PLACE OF DEATH: 35 LAKE TRAIL, PAWLEYS ISLAND, SC 29585

PLACE OF DISPOSITION: GFH CREMATORY

DISPOSITION LOCATION: MURRELLS INLET, SOUTH CAROLINA

METHOD OF DISPOSITION: CREMATION

DECEDENT'S RESIDENCE: 35 LAKE TRAIL, PAWLEYS ISLAND, GEORGETOWN COUNTY, SC, 29585

PLACE OF BIRTH: NEW JERSEY

SURVIVING SPOUSE'S NAME: MARY RUCKER

FATHER'S NAME: ROBERT JOSEPH MORAN SR

MOTHER'S NAME PRIOR TO FIRST MARRIAGE: MARIE BIRCH

INFORMANT'S NAME: MARY MORAN

MAILING ADDRESS: 35 LAKE TRAIL, PAWLEYS ISLAND, SC, 29585

FUNERAL HOME: GOLDFINCH FUNERAL HOME - BEACH CHAPEL, 11528 HWY 17 BYPASS, MURRELLS INLET, SC, 29576-1009

FUNERAL DIRECTOR: PHILLIP L. SAWYER

EMBALMER'S NAME: NA

ACTUAL OR PRESUMED DATE OF DEATH: DECEMBER 23, 2018

ACTUAL OR PRESUMED TIME OF DEATH: 0615

CAUSE OF DEATH - PART I  
CANCER OF THE BLADDER

N/A

N/A

N/A

OTHER SIGNIFICANT CONDITIONS - PART II:

N/A

CORONER CONTACTED? YES

DATE OF INJURY: NA

PLACE OF INJURY: NA

LOCATION OF INJURY: NA

HOW THE INJURY OCCURRED?

NA

AUTOPSY PERFORMED? NO

TIME OF INJURY: NA

AUTOPSY AVAILABLE? NA

INJURY AT WORK? NA

CERTIFIER NAME AND TITLE: MD EDWIN LEE MCCAMPBELL

LICENSE NUMBER: 34466

CERTIFIER'S ADDRESS: 391 SEABOARD ST, SUITE 6, MYRTLE BEACH, SC, 29577

DATE FILED: DECEMBER 24, 2018

DATE OF ISSUANCE: DECEMBER 27, 2018

SPECIAL INSTRUCTIONS:

NA

SC07292990

This is a true certification of the facts on file in the Division of Vital Records, SC Department of Health and Environmental Control.

David E. Wilson, Jr.  
Acting Director

Angela P. Saleeby  
Assistant S

This is watermarked paper. Do not accept without noting watermark

Revision Date: 04/09/2018



EXHIBIT C

# HOPKINS LAW FIRM, LLC

12019 OCEAN HIGHWAY  
POST OFFICE BOX 1885  
PAWLEYS ISLAND, SOUTH CAROLINA 29585  
TELEPHONE: 843-314-4202  
FACSIMILE: 843-314-9365  
WWW.HOPKINSFIRM.COM

WILLIAM E. HOPKINS JR. \*†  
J. CLAY HOPKINS  
IAN TAYLOR

October 10, 2018

\*ALSO ADMITTED IN  
DISTRICT OF COLUMBIA  
†SOUTH CAROLINA  
CERTIFIED MEDIATOR

Georgetown County Clerk of Court  
Attn: Jennifer Lawrence  
Post Office Box 479  
Georgetown, SC 29442

Re: CRM of the Carolinas, LLC v. Trevor Steel  
Civil Action No.: 2017-CP-22-00856


Dear Jennifer:

The above referenced matter is currently listed as number 24 on the ADR Sanctions Roster scheduled for Thursday, October 11, 2018 at 11:00 a.m. in Georgetown County. Please be advised that the mediation of this case has been scheduled for November 28, 2018 with Robert Buffington, Esquire serving as Mediator.

We therefore request that this matter be removed from tomorrow's ADR Sanctions Roster with Judge Seals.

Sincerely,

HOPKINS LAW FIRM, LLC



William E. Hopkins, Jr.

WEHjr/kyr  
Enclosure

cc: Robert J. Moran, Esquire  
CRM of the Carolinas, LLC

ELECTRONICALLY FILED - 2018 Oct 10 8:19 AM - GEORGETOWN - COMMON PLEAS - CASE#2017CP2200856

**FW: Bob Moran's obituary attached****Cindy Howard** <choward@gtcounty.org>

Thu, Dec 27, 2018 at 9:00 AM

To: Amber Chaviano <amber@horrylaw.com>, Angie Knight <INFO@grandstrandlawgroup.com>, Anita Floyd, Esquire <afloyd@anitafloydlaw.com>, Ann Roschy (annroschy@rivertownlaw.net) <annroschy@rivertownlaw.net>, Anna S. Magann, Esquire <amagann@mcgowanhood.com>, Anne Janes, Esquire <janeslaw@aol.com>, Ashley Avant, Assistant to Laura M. Moyer <ashley@maringmoyer.com>, Bridget Potter, Secretary to Anita Floyd Lee <bpotter@anitafloydlaw.com>, Bridget Scott--secretary to M. Amanda Harrelson Shuler <bscott@attorneyssc.com>, Cathy Wheeler, secretary for Robert L. Lumpkin, Jr. <cwheeler@sc.rr.com>, Cecil W. Clarkson, III <dusenburyclarkson@frontier.com>, Chelsey L. Moore, Esquire <cmoore@grandstrandlawgroup.com>, Cheryl Meyer <cmeyer@horrylaw.com>, Cheryl Turner Hopkins, Esquire <cthopkinslawfirm@aol.com>, Cynthia M. Lover, Esquire <LoverLawFirm@aol.com>, Dainyel Morris <dainyel@jenkinsonlaw.com>, Daniel A. Selwa, II, Esquire <selwa@sclawyers.net>, David Gundling, Esquire <davidg@gundlinglaw.com>, David J. Mason, Esquire <MASON@gardencitylawfirm.com>, Dawn Berry, Esquire <dawn.berry@dss.sc.gov>, Dee Kampman, Administrative Assistant to Dave Mason <dee@gardencitylawfirm.com>, Diana Smerechniak <diana@horrylaw.com>, Donna Gray <degray@crosbyfirm.com>, Elise Crosby, Esquire <ecrosby@crosbyfirm.com>, Emily M. Sordian, Esquire <Emily@gotaxelrod.com>, Ernest Jarrett, Esquire <ernie@jenkinsonlaw.com>, Frederick Harris, Esquire <morris@harrisandleonard.com>, G. Turner Perrow, Jr., Esquire <turner@tidelandslaw.net>, Gerald Harmon, Jr., Esquire <gh@harmonandfelts.com>, Gregory Askins, Esquire <askinsgregg@gmail.com>, Hal M. Strange, Esquire <HMS@sc.rr.com>, Harry Oxner <OXHAT@aol.com>, Heather Cannon, Esquire <CANNONHM@hotmail.com>, Holly H. Wall <mhrhj@aol.com>, James Purvis, Jr., Esquire <jpurvis@lawofficesofdurant.com>, James R. Felts, IV <jrf@harmonandfelts.com>, Jason Boan, Esquire <boanlawfirm@yahoo.com>, Jessica S. Benson, Esquire <jessicabenson@aol.com>, Jessie Dugan <jdugan@crosbyfirm.com>, Jim Young, Esquire <jyoung@horrylaw.com>, Joe Crosby, Esquire <jcrosby@crosbyfirm.com>, John M. Hilliard, III, Esquire <info@hilliardlawfirm.com>, John Prosser, Esquire <shannon@prosserlawfirm.com>, Jonathan M. Hiller, Esquire <jhiller@hillerlawfirm.com>, Joseph Burroughs, Esquire <jburroughs@horrylaw.com>, Josh Edgeworth, Esquire <josh.edgeworth@gmail.com>, K. Douglas Thornton, Esquire <kdouglasthornton@aol.com>, Kathryn Sligh, Esquire <ksligh@horrylaw.com>, Kathy Kizer, Assistant to George Hearn <kkzyer@sccoast.net>, Kerry K. Jardine, Esquire <kerryjardine@sclegal.org>, Kimberly V. Barr, Esquire <kbarr@sabblaw.com>, L. Bradley Smith <bradsmith@rivertownlaw.net>, Laura Moyer, Esquire <Laura@maringmoyer.com>, Linda Burroughs, Esquire <lmburroughs@aol.com>, Lisa Carver, Esquire <lisa@carverlawfirmllc.com>, Louis Morant, Esquire <lawyers@morantlaw.com>, Louise Mouzon <louise@jenkinsonlaw.com>, Lucas M. Oates, Esquire <lucasoates@sclegal.org>, Lynette Hedgepath, Esquire <lynette@sccoast.net>, M. Amanda Harrelson Shuler, Esquire <mshuler@attorneyssc.com>, M. Amber Rogers, Esquire <amber@prosserlawfirm.com>, Maribel James <Maribel@maringmoyer.com>, Martha Hamel's Assistant <hamelassist@sc.twcabc.com>, Martha L. Hamel, Esquire <MLHamel@sc.twcabc.com>, Melanie C. Nicholson, Esquire <mnicholson@wwpemlaw.com>, Melissa Moore <melissa@harmonandfelts.com>, Michelle, Paralegal to James Purvis <rmichele@lawofficesofdurant.com>, Missy McDaniel, Paralegal to Daniel A. Selwa, II <mcdaniel@sclawyers.net>, N. David DuRant and Associates, P.A. <officesofdaviddurant@sc.rr.com>, Nadia Black <nblack@gtcounty.org>, Paola Pinzon <paolapinzon@hotmail.com>, Pat Harrington <patricia.harrington@dss.sc.gov>, Randy Mullins, Esquire <Mullinslawfirm@aol.com>, Regina B. Ward <Regina@attorneyreginaward.com>, Regina Cagle <kdouglasthornton@gmail.com>, Regina Ward's Paralegal <Paralegal@attorneyreginaward.com>, Reuben Goude, Esquire <reubengoude@earthlink.net>, Robert B. Strickland, IV, Esquire <rbs@patrickandstathos.com>, Robert Maring, Esquire <Robert@maringmoyer.com>, Robert Moran, Esquire <mullettllaw@sc.rr.com>, Roger Giardino, Esquire <GiardinoLaw@gmail.com>, Roland Bradley Yates, Jr., Esquire <bradley@theyatesfirm.com>, Ronald J. Talbert, Esquire <ron@rontalbertlaw.com>, Ronald Solomon, Paralegal <ronald@goldfinchwinslow.com>, Russell W. Hall, III, Esquire <lawyerhall@yahoo.com>, Ryan A. Stampfle, Esquire <ryanstampfle@murraylaw.info>, Sandye Teague Hicks <Sandye@attorneyreginaward.com>, Terri..Nancy Bailey's secretary <terri@nbaileylaw.com>, Thomas D. Guest, Jr., Esquire <vguest@posglaw.com>, Thomas W. Winslow, Esquire <tom@goldfinchwinslow.com>, V. Lee Moore, Esquire <moore@grandstrandlawyers.com>, Val Gundling <val@gundlinglaw.com>, Valerie Edwards <vedwards@horrylaw.com>, Vanessa Richardson, Esquire <vnsrc@msn.com>, Vicki P. Owens, Secretary to Hal M. Strange <vpo@sc.rr.com>, W. Sherwyn Jacobs, Esquire <wsjacobs.atty@gmail.com>, Ward Law Firm <Secretary@attorneyreginaward.com>, Whitney Crooks, Secretary to Hal Strange <wacrooks@sc.rr.com>, William E. Hopkins, Jr., Esquire <bill@hopkinsfirm.com>

Cc: Ht Abbott <htabbott43@aol.com>, tezbannoitt@gmail.com <tezbannoitt@gmail.com>, Holmes, Jan Bromell <jholmesj@sccourts.org>, Holmes, Jan Bromell Secretary (Sharon Anderson) <JHolmesSC@sccourts.org>, Buckhannon, Melissa J. <mbuckhannonj@sccourts.org>, Buckhannon, Melissa J. Secretary (Julia Guyton) <MBuckhannonSC@sccourts.org>, Norton, Ronald R. <rnortonj@sccourts.org>, Norton, Ronald R. Secretary (Darena Edge) <rnortonsc@sccourts.org>, Ikinon@yahoo.com <ikinson@yahoo.com>

Good Morning Everyone:

I am forwarding the obituary for Robert (Bob) Moran. He passed away on December 23<sup>rd</sup>.

Please be praying for his family.

Have a blessed day.

Cindy Howard

Family Court Supervisor

Georgetown County Clerk of Court

**From:** MLHatPawleys [mailto:mlhatpawleys@aol.com]

**Sent:** Wednesday, December 26, 2018 2:23 PM

**To:** Cindy Howard <choward@gtcounty.org>

**Subject:** Bob Moran's obituary attached

Cindy,

Would you kindly forward Bob Moran's attached obituary to the legal community at your earliest convenience? Thank you, Martha

**Bob Moran obituary.pdf**

Courtesy NEF RE: 2017CP2200856

From: efiledonotreply@sccourts.org

To: mullettlaw@aol.com

Cc: mullettlaw@sc.rr.com

Date: Tuesday, January 29, 2019 at 08:40 AM EST

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 01-29-2019 08:40:17 AM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Llc VS Trevor W Steel  
**Document(s) Submitted:** Letter/Letter  
**Filed by or on behalf of:** William E. Hopkins, Jr.

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

Robert J. Moran, Jr. for Trevor W Steel  
William E. Hopkins, Jr. for Crm Of The Carolinas Llc

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

---- 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.

**HOPKINS LAW FIRM, LLC**

12019 OCEAN HIGHWAY  
POST OFFICE BOX 1885  
PAWLEYS ISLAND, SOUTH CAROLINA 29585  
TELEPHONE: 843-314-4202  
FACSIMILE: 843-314-9365  
WWW.HOPKINSFIRM.COM

WILLIAM E. HOPKINS JR. \*†  
J. CLAY HOPKINS  
IAN TAYLOR

\*ALSO ADMITTED IN  
DISTRICT OF COLUMBIA  
†SOUTH CAROLINA  
CERTIFIED MEDIATOR

January 29, 2019

Jennifer Lawrence  
Common Pleas Court Coordinator

Lucinda LeSane  
Common Pleas Supervisor

Re: CRM of the Carolinas, LLC v. Trevor W. Steel  
Civil Action No.: 2017-CP-22-00856

Dear Ms. Lawrence and Ms. LeSane:

I am writing to inform you that mediation has been scheduled in the above referenced matter for **Tuesday, February 5, 2019 at 2:00 p.m.** and the mediator is Bobby Buffington. This matter was previously scheduled for mediation on November 28, 2018, but Mr. Steel's counsel, Bob Moran, was admitted to the hospital in North Carolina immediately before this date and the mediation had to be canceled. As you know, Mr. Moran passed away and at this time, the Defendant, Trevor Steel, has not retained new counsel.

I spoke with Mr. Steel yesterday and informed him of the requirement that we reschedule the mediation and he has cooperated fully. I am providing a copy of this correspondence to Mr. Steel via email.

It is my understanding this will alleviate the necessity of our attendance at the ADR Roster Meeting on Thursday, January 31, but please let me know if I am mistaken.

Sincerely,

HOPKINS LAW FIRM, LLC



William E. Hopkins, Jr.

WEHjr/kyr

cc: Trevor Steel (via email [trevor@trevorandashby.com](mailto:trevor@trevorandashby.com))

ELECTRONICALLY FILED - 2019 Jan 29 8:40 AM - GEORGETOWN - COMMON PLEAS - CASE#2017CP2200856

---

**Received Notice: Your filing, Re: 2017CP2200856 - (140) Breach of Contract - Notice/Notice of Appearance, was received**

1 message

---

**efiledonotreply@sccourts.org** <efiledonotreply@sccourts.org>  
To: giardinolaw@gmail.com  
Cc: rogerg@mandarichlaw.com

Fri, May 3, 2019 at 10:44 AM

**To:** Roger Philip Giardino, Jr. giardinolaw@gmail.com  
**From:** efiledonotreply@sccourts.org  
**Date:** 2019-05-03 10:43:33.37  
**Subject:** Your electronic filing, Re: 2017CP2200856 - (140) Breach of Contract - Notice/Notice of Appearance, was received by CIRCUIT COURT.

Case Number: 2017CP2200856  
Case Type: (140) Breach of Contract  
Document Type: Notice/Notice of Appearance

~~~ 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.

EXHIBIT F

---

**Accepted Notice: Your filing, Re: 2017CP2200856 - (140) Breach of Contract - Notice/Notice of Appearance, was accepted**

1 message

---

**efiledonotreply@sccourts.org** <efiledonotreply@sccourts.org>  
To: giardinolaw@gmail.com  
Cc: rogerg@mandarichlaw.com

Fri, May 3, 2019 at 10:44 AM

**To:** Roger Philip Giardino, Jr. giardinolaw@gmail.com  
**From:** efiledonotreply@sccourts.org  
**Date:** 2019-05-03 10:43:33.37  
**Subject:** Your electronic filing, Re: 2017CP2200856 - (140) Breach of Contract - Notice/Notice of Appearance, was accepted by CIRCUIT COURT.

Case Number: 2017CP2200856  
Case Type: (140) Breach of Contract  
Document Type: Notice/Notice of Appearance  
Reason(s): (none provided)

~~~ 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.

---

**Courtesy NEF RE: 2017CP2200856**

1 message

---

efiledonotreply@sccourts.org <efiledonotreply@sccourts.org>  
To: giardinolaw@gmail.com  
Cc: rogerg@mandarichlaw.com

Fri, May 3, 2019 at 10:52 AM

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 05-03-2019 10:49:37 AM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Lic VS Trevor W Steel  
**Event(s):** Order/Order Cover Sheet \$25.00

**Document(s) Submitted:** Proposed Order/Referred to Master or Special Referee  
**Filed by or on behalf of:** Roger Philip Giardino, Jr.

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

Robert J. Moran, Jr. for Trevor W Steel  
William E. Hopkins, Jr. for Crm Of The Carolinas Lic  
Roger Philip Giardino, Jr. for Trevor W Steel

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

~~~ 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.

---

**Courtesy NEF RE: 2017CP2200856**

2 messages

---

efiledonotreply@sccourts.org <efiledonotreply@sccourts.org>

Mon, May 6, 2019 at 1:33 PM

To: giardinolaw@gmail.com

Cc: rogerg@mandarichlaw.com

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 05-06-2019 01:33:07 PM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Llc VS Trevor W Steel  
**Document(s) Submitted:** Order/Referred to Master or Special Referee Order/Referred to Master or Special Referee  
**Filed by or on behalf of:** Benjamin H. Culbertson

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

- Robert J. Moran, Jr. for Trevor W Steel
- William E. Hopkins, Jr. for Crm Of The Carolinas Llc
- Roger Philip Giardino, Jr. for Trevor W Steel

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

~~~~ 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.

---

efiledonotreply@sccourts.org <efiledonotreply@sccourts.org>

Mon, May 6, 2019 at 1:49 PM

To: giardinolaw@gmail.com

Cc: rogerg@mandarichlaw.com

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 05-06-2019 01:49:08 PM  
**Court:** CIRCUIT COURT

**EXHIBIT H**

Common Pleas

Georgetown

**Case Caption:**

Crm Of The Carolinas Llc VS Trevor W Steel

**Document(s) Submitted:**

Order/Electronic Form 4/Case Referred to Master Order/Electronic Form 4

**Filed by or on behalf of:**

Benjamin H. Culbertson

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

Robert J. Moran, Jr. for Trevor W Steel

William E. Hopkins, Jr. for Crm Of The Carolinas Llc

Roger Philip Giardino, Jr. for Trevor W Steel

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

[Quoted text hidden]

---

**Courtesy NEF RE: 2017CP2200856**

1 message

---

efiledonotreply@sccourts.org <efiledonotreply@sccourts.org>

Fri, Oct 18, 2019 at 3:55 PM

To: giardinolaw@gmail.com

Cc: rogerg@mandarichlaw.com

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 10-18-2019 03:55:01 PM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Llc VS Trevor W Steel  
**Document(s) Submitted:** Master/Order Master/Order/Other  
**Filed by or on behalf of:** Joe M. Crosby

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

- Robert J. Moran, Jr. for Trevor W Steel
- William E. Hopkins, Jr. for Crm Of The Carolinas Llc
- Roger Philip Giardino, Jr. for Trevor W Steel

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

~~~ 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.

**EXHIBIT I**

---

**Courtesy NEF RE: 2017CP2200856**

1 message

---

efiledonotreply@sccourts.org <efiledonotreply@sccourts.org>  
To: giardinolaw@gmail.com  
Cc: mullettlaw@sc.rr.com

Wed, Mar 4, 2020 at 11:20 AM

---

**\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\***  
**NOTICE OF ELECTRONIC FILING [NEF]**

---

**A filing has been submitted to the court RE: 2017CP2200856**

**Official File Stamp:** 03-04-2020 11:19:42 AM  
**Court:** CIRCUIT COURT  
Common Pleas  
Georgetown  
**Case Caption:** Crm Of The Carolinas Llc VS Trevor W Steel  
**Event(s):** Order/Order Cover Sheet \$25.00  
  
**Document(s) Submitted:** Proposed Master/Order/Other  
**Filed by or on behalf of:** Roger Philip Giardino, Jr.

This notice was automatically generated by the Court's auto-notification system.

---

**The following people were served electronically:**

Robert J. Moran, Jr. for Trevor W Steel  
William E. Hopkins, Jr. for Crm Of The Carolinas Llc  
Roger Philip Giardino, Jr. for Trevor W Steel

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

--- 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.

**EXHIBIT J**

---

**2017-CP-22-00856/CRM of the Carolins LLC vs Trevor W Steel**

---

Lucinda Lesane <llesane@gtcounty.org>

Mon, Jun 3, 2019 at 3:56 PM

To: "bill@hopkinsfirm.com" <bill@hopkinsfirm.com>, "giardinolaw@gmail.com" <giardinolaw@gmail.com>

Cc: Donna Gray <degray@crosbyfirm.com>

Good Afternoon,

Donna, at the Master in Equity's Office, needs to be contacted to pay their fee and schedule a hearing.

Thank you.

Lucinda LeSane

Common Pleas Supervisor

Georgetown County Clerk of Court Office

(843) 545-3228



Do Not Drive Faster Than Your Guardian Angel Can Fly.

EXHIBIT K

---

**CRM v. Steele**

1 message

---

**Roger Giardino** <giardinolaw@gmail.com>

Wed, Sep 25, 2019 at 1:52 PM

To: Bill Hopkins <bill@hopkinsfirm.com>, Mullett Law <mullettlaw@sc.rr.com>

Hello Bill,

Hope all is well. Thank you for your efforts with the Denton/Hickson and Jackson/Whitener/Stalvey matters.

Any chance we may resolve the CRM v. Steele matter. It's coming up in The middle of October. Last we spoke, I believe you mentioned you were going to reach out to Keith Errico to see if he may wish to walk away.

Please let me know, thanks and have a great day.

--

Roger P. Giardino, Esq.

Mobile Email

Giardino Law Firm LLC  
P.O. Box 4413  
Pawleys Island, SC 29585

Voice: 843-237-4533 & 843.314.4321  
Facsimile: 843.314.4322

Admitted to practice in NY, DC & SC

**CONFIDENTIAL COMMUNICATION:** The information contained in this message may contain legally privileged and confidential information 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 duplication of this transmission is strictly prohibited. If you have received this communication

in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind

under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law. IRS CIRCULAR NOTICE: Any federal tax advice contained in this communication (or

in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.

**EXHIBIT L**

**CRM v. Steel**

3 messages

Roger Giardino <giardinolaw@gmail.com>

Fri, Jan 31, 2020 at 3:41 PM

To: Bill Hopkins <bill@hopkinsfirm.com>, Mullett Law <mullettlaw@sc.rr.com>

Bill,

Hope all is well. Please see attached. After you had the opportunity to review, kindly advise if you wish for any revisions.

Thank you and have a great weekend.

**Roger P. Giardino, Esq.**

**The Giardino Law Firm LLC  
P.O. Box 4413  
Pawleys Island, South Carolina 29585  
Tel: 843.237.4533 & 843.314.4321  
Fax: 843.237.3163 & 843.314.4322  
GiardinoLaw@gmail.com**

Admitted to practice law in NY, DC and SC

**CONFIDENTIALITY NOTICE:** This electronic mail transmission has been sent by a lawyer or law firm employee. It may contain information that is confidential, privileged, proprietary, or otherwise legally exempt from disclosure. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain, copy or disseminate this message, any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your computer system without reading the content and notify the sender immediately of the inadvertent transmission. There is no intent on the part of the sender to waive any privilege, including the attorney-client privilege that may attach to this communication. Thank you for your cooperation.

**IRS CIRCULAR 230 NOTICE:** Internal Revenue Service regulations generally provide that, for the purpose of avoiding federal tax penalties, a taxpayer may rely only on formal written advice meeting specific requirements. Accordingly, any such tax advice was not intended or written to be used, and it cannot be used, for the purpose of avoiding federal tax penalties that may be imposed on you or for the purpose of promoting, marketing or recommending to another party any tax-related matters.



Please consider the environment before printing this email.

**2017CP22000856 CRM of the Carolinas LLC v Trevor W Steel FINAL ORDER.docx**  
27K

Bill Hopkins <bill@hopkinsfirm.com>

Tue, Feb 4, 2020 at 2:53 PM

To: Roger Giardino <giardinolaw@gmail.com>, Mullett Law <mullettlaw@sc.rr.com>

Thanks Roger, just a couple of minor typos, I have attached for your review. You have my permission to send.

Bill

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

Please watch our firm video!

\*\*\* CONFIDENTIAL COMMUNICATION \*\*\* The information contained in this message may contain legally privileged and confidential information 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 duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

>

> \*\*\* IRS CIRCULAR 230 NOTICE \*\*\* Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.

[Quoted text hidden]

2 attachments



image001.png  
19K

 2017CP22000856 CRM of the Carolinas LLC v Trevor W Steel FINAL ORDER.docx  
28K

Roger Giardino <giardinolaw@gmail.com>  
To: Bill Hopkins <bill@hopkinsfirm.com>, Mullett Law <mullettlaw@sc.rr.com>

Wed, Feb 5, 2020 at 12:08 PM

Thank you, Bill. Sorry about the typos. I will send it on to the court. Have a nice day,

Roger P. Giardino, Esq.

The Giardino Law Firm LLC  
P.O. Box 4413  
Pawleys Island, South Carolina 29585  
Tel: 843.237.4533 & 843.314.4321  
Fax: 843.237.3163 & 843.314.4322  
GiardinoLaw@gmail.com

Admitted to practice law in NY, DC and SC

**CONFIDENTIALITY NOTICE:** This electronic mail transmission has been sent by a lawyer or law firm employee. It may contain information that is confidential, privileged, proprietary, or otherwise legally exempt from disclosure. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain, copy or disseminate this message, any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your computer system without reading the content and notify the sender immediately of the inadvertent transmission. There is no intent on the part of the sender to waive any privilege, including the attorney-client privilege that may attach to this communication. Thank you for your cooperation.

**IRS CIRCULAR 230 NOTICE:** Internal Revenue Service regulations generally provide that, for the purpose of avoiding federal tax penalties, a taxpayer may rely only on formal written advice meeting specific requirements. Accordingly, any such tax advice was not intended or written to be used, and it cannot be used, for the purpose of avoiding federal tax penalties that may be imposed on you or for the purpose of promoting, marketing or recommending to another party any tax-related matters.



 Please consider the environment before printing this email.

[Quoted text hidden]