

**From:** [Josh Hawkins](#)  
**To:** [Charles Norris](#); [Paralegal](#); [Court Of Appeals Filings](#)  
**Cc:** [Helena Jedziniak](#); [Ethan Jedziniak](#); [Admin](#)  
**Subject:** Re: Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851  
**Date:** Wednesday, May 31, 2023 3:14:51 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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

Chuck,

Again, do whatever you want. We have 30 days to write our brief and consider what the best thing to do for our client is. If you want it so badly, order it from the court reporter like we did.

Im not going to do your job for you. If the appellate court tells us to give it to you, obviously, we will. But absent that, im not going to help you help State Farm engage in misconduct, which is what this case is about.

Sincerely,



**Joshua T. Hawkins**

Partner • Hawkins & Jedziniak, LLC

☎ Office (864) 275-8142 | Fax (864) 752-0911

✉ [josh@hjlsc.com](mailto:josh@hjlsc.com)

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**From:** Charles Norris <[charles@whelanmellen.com](mailto:charles@whelanmellen.com)>

**Date:** Wednesday, May 31, 2023 at 3:11 PM

**To:** Josh Hawkins <[josh@hjlsc.com](mailto:josh@hjlsc.com)>, Paralegal <[monica@hjlsc.com](mailto:monica@hjlsc.com)>, Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Helena Jedziniak <[Helena@hjlsc.com](mailto:Helena@hjlsc.com)>, Ethan Jedziniak <[ethan@hjlsc.com](mailto:ethan@hjlsc.com)>, Admin <[admin@hjlsc.com](mailto:admin@hjlsc.com)>

**Subject:** RE: Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851

I may wish to use it in our initial brief, even if you don't use it in yours. I will call the case handler, tell that person you have the transcript, that you will include it in the record on appeal (if you don't include it in the record on appeal I will in my designation) and that you refuse to send me a copy. Please reconsider your position before I call the case handler at the court of appeals. They may require me to file a motion. Do you really want to argue that?

Charles R. Norris

Whelan Mellen & Norris LLC  
89 Broad St., Charleston, SC  
Direct: 843.619.3824 | Main: 843.998.7099

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**From:** Josh Hawkins <josh@hjllcsc.com>  
**Sent:** Wednesday, May 31, 2023 3:07 PM  
**To:** Charles Norris <charles@whelanmellen.com>; Paralegal <monica@hjllcsc.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Helena Jedziniak <Helena@hjllcsc.com>; Ethan Jedziniak <ethan@hjllcsc.com>; Admin <admin@hjllcsc.com>  
**Subject:** Re: Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851

Do what you want.

Or order the transcript.

I don't really care.

We haven't written our brief yet, and we haven't decided what we are going to use, so we aren't responding to any of your requests, because we aren't required to.

Sincerely,



**Joshua T. Hawkins**

Partner • Hawkins & Jedziniak, LLC

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**From:** Charles Norris <[charles@whelanmellen.com](mailto:charles@whelanmellen.com)>  
**Date:** Wednesday, May 31, 2023 at 3:05 PM  
**To:** Josh Hawkins <[josh@hjllcsc.com](mailto:josh@hjllcsc.com)>, Paralegal <[monica@hjllcsc.com](mailto:monica@hjllcsc.com)>, Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Helena Jedziniak <[Helena@hjllcsc.com](mailto:Helena@hjllcsc.com)>, Ethan Jedziniak <[ethan@hjllcsc.com](mailto:ethan@hjllcsc.com)>, Admin <[admin@hjllcsc.com](mailto:admin@hjllcsc.com)>  
**Subject:** RE: Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851

No. If you are going to include the transcript in the record on appeal, as I assume you are, you need to send it to me. Ultimately, I will get it anyway if you include it in the record on appeal. If you are refusing to send me a transcript you have and which you intend to include in the record on appeal, go ahead and say so and I will bring this issue to the case handler at the court of appeals and see what they have to say.

Charles R. Norris  
Whelan Mellen & Norris LLC  
89 Broad St., Charleston, SC  
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**From:** Josh Hawkins <[josh@hjlsc.com](mailto:josh@hjlsc.com)>  
**Sent:** Wednesday, May 31, 2023 3:01 PM  
**To:** Charles Norris <[charles@whelanmellen.com](mailto:charles@whelanmellen.com)>; Paralegal <[monica@hjlsc.com](mailto:monica@hjlsc.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Helena Jedziniak <[Helena@hjlsc.com](mailto:Helena@hjlsc.com)>; Ethan Jedziniak <[ethan@hjlsc.com](mailto:ethan@hjlsc.com)>; Admin <[admin@hjlsc.com](mailto:admin@hjlsc.com)>  
**Subject:** Re: Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851

I believe you will need to request that.

Sincerely,



**Joshua T. Hawkins**

Partner • Hawkins & Jedziniak, LLC

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**From:** Charles Norris <[charles@whelanmellen.com](mailto:charles@whelanmellen.com)>  
**Date:** Wednesday, May 31, 2023 at 2:55 PM  
**To:** Paralegal <[monica@hjlsc.com](mailto:monica@hjlsc.com)>, Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Josh Hawkins <[josh@hjlsc.com](mailto:josh@hjlsc.com)>, Helena Jedziniak <[Helena@hjlsc.com](mailto:Helena@hjlsc.com)>, Ethan Jedziniak <[ethan@hjlsc.com](mailto:ethan@hjlsc.com)>, Admin <[admin@hjlsc.com](mailto:admin@hjlsc.com)>  
**Subject:** RE: Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851

The attachments show the court reporter sent you on April 26 the transcript of the hearing before Judge Morgan. Please send me by email the transcript you have in case I wish to reference it in our initial brief.

Charles R. Norris  
Whelan Mellen & Norris LLC  
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**From:** Paralegal <[monica@hjlsc.com](mailto:monica@hjlsc.com)>  
**Sent:** Wednesday, May 31, 2023 2:44 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Josh Hawkins <[josh@hjlsc.com](mailto:josh@hjlsc.com)>; Helena Jedziniak <[Helena@hjlsc.com](mailto:Helena@hjlsc.com)>; Ethan Jedziniak <[ethan@hjlsc.com](mailto:ethan@hjlsc.com)>; Admin <[admin@hjlsc.com](mailto:admin@hjlsc.com)>; Charles Norris <[charles@whelanmellen.com](mailto:charles@whelanmellen.com)>  
**Subject:** Filing--Notice of Appeal- Lucas v. State Farm, CA No.: 2022CP2303851

Good afternoon,

Please find attached for filing/service, Plaintiff/Appellant's Correspondence to the Clerk of Court of the South Carolina Court of Appeals, sent also via U.S. Mail.

Opposing counsel is being served via this filing and via U.S. Mail as well.

Should the Court need anything further, please do not hesitate to reach out to our office.

Sincerely,



**Monica Brody**

Certified Paralegal | Hawkins and Jedziniak, LLC

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**Web** [www.hawkinsandjedziniak.com](http://www.hawkinsandjedziniak.com)

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