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Jun 15 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Family Court

Family Court Case No. 2023-DR-32-00229

Appellate Case No. _____

Megan Cronin

Petitioner,

v.

William Cronin,

Respondent.

MOTION TO SUPPRESS ELECTRONIC COMMUNICATIONS

This matter comes before the Court on behalf of Megan Cronin, Petitioner herein (Plaintiff in the pending action before the Family Court for Lexington County) by and through her undersigned counsel, who would show unto this Court, pursuant to Rule 240, SCACR, and Court News as posted and denoted as 2020-03-20-01, and S. C. Code Ann. § 17-30-110, that the relief requested herein should be granted. Petitioner moves before this Court for an Order to suppress certain electronic communications including photographs that are part of the electronic communications between Petitioner and non-parties.

Petitioner makes this Motion on the following grounds:

1. Petitioner was made aware of certain electronic communications between herself and non-parties being accessed and downloaded by Respondent herein. Based upon information and belief, Respondent accessed Petitioner's iPhone either downloading certain electronic communications located on Petitioner's laptop computer which, based upon Petitioner's information and belief, automatically syncs all communications being sent or received to or from Petitioner's cell phone simultaneously with the transmission to or from Petitioner's MacBook Air (Petitioner's electronic devices sync with each other automatically.) In fact, Petitioner believes that on some occasions Respondent may have opened communications or read certain communications being received by Petitioner prior to her actually seeing those communications appear on her cell phone.

2. It is unknown when exactly the misconduct of Respondent began or ended. Petitioner became aware of these intercepted electronic communications when Respondent attempted to utilize or in fact utilized certain electronic communications during the pendency of the underlying Family Court action.

3. The actions of Respondent are clearly a violation of the Electronic Communications Privacy Act, Stored Communications Act, the Computer Fraud and Abuse Act, and, based upon information and belief, include the interceptions of certain electronic communications between Petitioner and non-party individuals and accessing other stored electronic communications. Petitioner is informed and believes that Respondent has gone so far as to attempt to utilize these illegally

intercepted electronic communications by sending screenshots or photographs of said communications to various Courts.

4. Counsel for Petitioner would submit that on its face the actions of Respondent in intercepting electronic communications between Petitioner and non-parties is in violation of federal law, specifically U.S. Code Ann., 18 U.S.C.A. § 2511 (1) and the disclosure of the contents of these electronic communications pursuant to 18 U.S.C.A. § 2515 would subject the violator to both criminal and civil sanctions as provided for in those code provisions, thereby subjecting the violator and/or anyone who further transmits the information to up to five (5) years imprisonment or a fine. Further, 18 U.S.C.A. § 2515 specifically prohibits the use of these recorded conversations or the use of any evidence of intercepted wire or oral communications in "... any trial, hearing, or other proceeding in or before any Court, ... of the United States, a state, or a political subdivision thereof if the disclosure of that information would be in violation of this chapter" as well as the corresponding state statute as addressed hereinbelow.

5. South Carolina law similarly forbids under S.C. Code Ann. § 17-30-20 the intentional interception, attempt to intercept, or disclosure to any person the contents of any wire, oral, or electronic communication knowing or having reason to know that the information was obtained by the interception to be punishable by a fine of up to \$5,000.00 and imprisonment of not more than five (5) years. South Carolina law similarly under S.C. Code Ann. § 17-30-65 forbids the admissibility or use of the contents of such intercepted communication or the fruits thereof.

6. The actions of Respondent have left no option to Petitioner but to seek an Order of this court suppressing the release of the content of these electronic communications in any proceedings including the pending proceeding herein. Further, Petitioner believes that Respondent's actions resulted in the necessity of filing this Motion to Suppress and Petitioner seeks an award of reasonable attorney's fees and costs for the necessity of this motion.

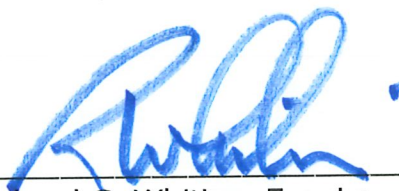
For these reasons and such further reasons as may appear at any hearing to be set on the matter, Petitioner hereby moves for a hearing to be held by this Court, if needed following this Court's review of this Motion and attachments, as required by S. C. Code Ann. § 17-30-110, *et seq*, and U. S. Code Ann., 18 U.S.C.A. § 2511, *et seq*, and appropriate rulings made as to the intercepted communication(s) and that in the interim, any action by the trial court below be stayed in addition to an Order requiring the immediate listing of and disclosure of all documents and/or records concerning the interception of electronic communications of Petitioner, plus such other action, rulings, and other relief as may be appropriate in this matter, including, but not limited to, an award of attorney's fees, costs and expenses. Counsel affirms to this Court that he has, by copy of this Motion, notified Family Court counsel for Petitioner, Family Court counsel for Respondent, and the Family Court of Lexington County of this Motion.

Petitioner also moves for an order of this Court requiring the lower Court to segregate and seal the unlawfully obtained electronic communications and any evidence that has been gleaned from the use of said communications. Petitioner

believes that information should be separated in the Court's file prohibiting review of said information by the Court, either party, or the public.

South Carolina Rules of Civil Procedure Rule 11 Affirmation. The undersigned, as counsel for Petitioner herein, certifies that consultation to resolve this petition would serve no useful purpose and cannot be timely held.

Respectfully submitted,



Richard G. Whiting, Esquire
Attorney for Petitioner
SC Bar No. 6078
1515 Lady Street (29201)
Post Office Box 7877
Columbia, SC 29201
803.256.9067
dick.whiting@whitinglawsc.com

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**AFFIDAVIT OF PETITIONER IN SUPPORT OF
MOTION TO SUPPRESS ELECTRONIC COMMUNICATIONS**

My name is Megan Cronin, I am over eighteen years of age and reside in Lexington County, South Carolina. I am a speech therapist and a feeding facilitator, that being when small child has difficulties being fed from its mother's breast or from a bottle and children with various feeding disorders such as selective eating, failure to thrive, G-tube dependency, etc.

I utilize an Apple iPhone and I previously utilized an Apple MacBook Air that I used in association with my business. My Family Court attorney has informed me that opposing counsel in the underlying Family Court action has indicated that my husband (Respondent herein), without my knowledge or consent, has been monitoring my


electronic communications and has apparently downloaded certain electronic communications between myself and non-party individuals, Respondent further having downloaded and viewed certain communications between myself and my attorney, as well as my patients in violation of HIPAA.

I never authorized or consented in any way to allow Respondent to have the use of my computer which was password protected.

I am seeking an Order of this court suppressing any unlawfully obtained electronic communications. It is clear that these Apple devices sync with each other and, as I understand it, such syncing is equivalent to an intercept the moment electronic communication is directed to several devices simultaneously.


Pursuant to the case of Fulmer v. Buckhannon, et al, decided by this Court, I believe that the suppression of all my electronic communications from all these devices in any forum is appropriate.

Respectfully submitted,


Megan Cronin

Sworn to and subscribed before me this

15th day of June, 2023


Notary Public for South Carolina

My commission expires 10-13-2027

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Respondent.

**AFFIDAVIT OF STEVEN M. ABRAMS, J.D., M.S. IN SUPPORT OF
MOTION TO SUPPRESS ELECTRONIC COMMUNICATIONS**

My name is Steven M. Abrams, I am over eighteen years of age and reside in Charleston County, South Carolina. I am a licensed Attorney and Counselor at Law, in good standing, in South Carolina, Washington, DC, and New York. I am a member of the South Carolina Bar, The Washington DC Bar, The New York State Bar Association, and the New York State Academy of Trial Lawyers. I am a retired South Carolina State Constable. My field of concentration within law enforcement and my legal practice is in digital forensics and cyber privacy law. For nearly 30 years, I have assisted municipal, county, state, and federal law

enforcement agencies and the US Department of Defense and the Department of State with digital forensics investigations. For 11 years, from 2008 until my retirement in 2019, I held a law enforcement commission from the Governor of South Carolina at the request of the United States Secret Service. My full credentials are included in my CV which is appended to this affidavit.

My opinions expressed in this affidavit are based upon my reading of the Affidavit of Petitioner, Megan Cronin, an interview of Petitioner which I conducted on June 8, 2023, and my three decades of training and experience in the field of digital forensics, computer science, and cyber privacy law.

These are the facts which Petitioner imparted to me during her interview.

Petitioner is a therapist who uses her phone and computer to communicate with her patients. These communications are protected under HIPAA. Petitioner also used her phone and computer to engage in attorney-client privileged communications with her attorney during domestic relations litigation.

Petitioner believes that her husband, Respondent William Cronin, monitored her whereabouts and communications for at least the past three years. On at least three occasions she discovered Respondent in unauthorized possession of her iPhone, paging through her personal communications. Petitioner stated that she never consented or gave her husband permission to

examine or to eavesdrop on her electronic communications on the phone.

Petitioner is certain that she changed the passcode on her iPhone in the summer of 2022. Petitioner remembers that she may also have changed the passcode on her iPhone previously in 2021. Petitioner made diligent and consistent efforts to safeguard the privacy of the communications on her iPhone.

Petitioner also became aware that during this same period that Respondent was monitoring her phone, he was also tracking her whereabouts and recording her conversations without her knowledge or consent.

In December 2021, Petitioner purchased a new MacBook Air laptop computer for her work. Petitioner used this computer to communicate with her patients and her attorney. In addition, the iMessage stream on Petitioner's iPhone was synched in real time with the iMessages stored on the MacBook. Both Apple devices, iPhone, and MacBook, were simultaneously connected to Petitioner's iMessage stream. The MacBook was primarily secured by requiring Petitioner's fingerprint to gain access, but also had a backup means of access employing a password.

During the domestic relations litigation, Petitioner's lawyer was informed by Respondent's lawyer that Respondent had been monitoring Petitioner's electronic communications that were synched from her iPhone on to the MacBook Air. Although Petitioner never gave the MacBook password to Respondent, he was somehow able to obtain it to gain access to the MacBook

data. Once he was able to access Petitioner's communications on the MacBook, Respondent took a series of photos of the screen of the MacBook to capture Petitioner's private electronic communications that were synched from her iPhone. Petitioner has seen these photos depicting her intercepted communications and believes that the bulk of this data was captured on or about the 1st of January 2023. She believes that these communications were largely sent to and from her iPhone the same day, or at most within only a few days of when Respondent acquired them.

My observations and opinions


Pursuant to the case of *Fulmer v. Buckhannon, et al*, decided by this Court, I believe that Respondent's unauthorized use of the MacBook Air to monitor and capture the private iMessage traffic synched from Petitioner's iPhone constitutes a series of illegal "interceptions" as understood in the South Carolina Homeland Security Act. As was established in *Fulmer v. Buckhannon* technically there is no difference in effect obtaining electronic communications without consent from an iPhone or a shared auxiliary Apple device (iPad, iWatch, MacBook) because they employ packetized communications synched over a common Apple Server. The electronic communications are forked off at the server and simultaneously redirected to the auxiliary devices at the same instant as the original communications are sent to the iPhone (the primary destination).

Since the "interception" occurs simultaneously at the server, it is not necessary that the communications are received or observed exactly simultaneously on the various Apple devices.

Further, any use of these intercepted communications, for example by Respondent or his attorney in the domestic relations litigation between these parties or in any other court or forum, would be a further violation of the South Carolina Homeland Security Act's "use" prohibition (South Carolina Code of Laws § 17-30-20(6)) and similar "use" prohibitions under United States federal law.

Therefore, the suppression of the intercepted electronic communications from all of Petitioner's synched Apple devices is the appropriate remedy under South Carolina law and should be applied in every legal forum.

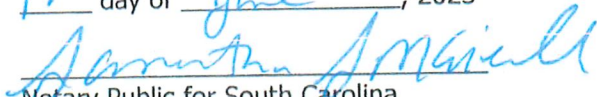
Respectfully submitted,



Steven Marc Abrams, J.D., M.S.

Sworn to and subscribed before me this

14th day of June, 2023


Notary Public for South Carolina

My commission expires March 18, 2024

APPENDIX A.

**Steven M. Abrams, J.D., M.S.
Curriculum Vitae**

Steven M. Abrams, J.D., M.S.
Attorney, Digital Forensics Examiner and Instructor
1154 Holly Bend Drive
Mount Pleasant, SC 29466
843-216-1100
Steve@AbramsForensics.com

Curriculum Vitae

My key practice areas are Electronic Privacy, Digital Forensics and e-Discovery, and Computer Law.

Education

- 2016 -Techno Security 2016, Computer Forensics Training Seminar, Myrtle Beach, SC, June 5-8, 2016
- 2014 -Georgia Bureau of Investigations, Internet Evidence Finder Forensics Training, Decatur, Georgia, February 2014
- 2013 -Techno Security 2013, Computer Forensics Training Seminar, Myrtle Beach, SC, June 2-5, 2013
- 2012 -Techno Security 2012, Computer Forensics Training Seminar, Myrtle Beach, SC, June 3-6, 2012
- 2011 -November 9-12: EnCase 7 Training, Salt Lake City, UT
-November 6 – 9: Paraben Forensics Innovations Conference, Park City, UT
- South Carolina Assoc. of Legal Investigators (SCALI) Annual Training Seminar, May 2011
- April 7, 2011: SC Electronic Crime Task Force Quarterly Meeting and Training
- 2010 -Techno Security 2010, Computer Forensics Training Seminar, Myrtle Beach, SC, June
- SCALI Annual Training Seminar, May 2010
- 2009 - Cellebrite Mobile Device Forensics Certification (CCMDE), SEMAR, Mexico City, Mexico
-SCALI Annual Training Seminar, May 2009
- 2008 - South Carolina Basic Constable Training, Tri-County Technical College / SC Criminal Justice Academy, October – November 2008
- Commissioned as a South Carolina State Constable (LEO) on November 20, 2008.
- Techno Security 2008, Computer Forensics Training Seminar, Myrtle Beach, SC, June
- 2007 - Charleston School of Law, Charleston, SC, Juris Doctor (J.D. - Magna Cum Laude)
- GMU2007 Computer Forensics Symposium, Regional Computer Forensic Group of the High Technology Crime Investigation Association, Fairfax VA, Aug. 2007 (40 CEU HTCIA)
- Techno Security 2007, Computer Forensics Training Seminar, Myrtle Beach, SC, June

- 2006 - University of Aberdeen, School of Law, Kings College, Old Aberdeen, Scotland
in collaboration with the University of Baltimore Law School
Summer Law Program in Comparative Criminal Procedure and UK Business Entities &
Taxation
- Techno Security 2006, Computer Forensics Training Seminar, Myrtle Beach, SC, June
- SCALI Annual Training Seminar, May 2006

- 2005 - SCALI Annual Training Seminar, May 2005
- SCALI Fall Training Seminar, October 2005

- 2004 - Access Data Advanced Windows Forensics, June 23-25, 2004, New York City. (24
Credit Hours)
- SCALI Annual Training Seminar, May 2004 (10 CEU)

- 2003 - GMU2003 Computer Forensics Symposium, Regional Computer Forensic Group
of the High Technology Crime Investigation Association, George Mason University,
Fairfax, VA. Aug.2003, (40 CEU HTCIA)
- Techno Security 2003, Computer Forensics and Security Conference (24 CEU)
- SCALI Annual Training Seminar & PI Training Seminar (16 CEU SLED)

- 2002 - SCALI Annual & Fall Training Seminars (16 CEU SLED)
- GMU2002 Computer Forensics Symposium, Regional Computer Forensic Group
of the High Technology Crime Investigation Association, Fairfax VA, Aug. 2002,
(40 CEU HTCIA)
- Access Data Computer Forensic Boot Camp, North Carolina Justice Academy,
Edneyville, NC (24 CEU)

- 1992-1994 Microsoft Internet Developer Workshops NY, NY

- 1992-1993 Novell NetWare CNE Training, IBM Skills Discovery, Jericho NY

- 1984-1985 Microcomputer and Electronics Engineering, Hofstra University, Hempstead NY

- 1982-1983 Ph.D. Studies, Faculty Fellowship, Columbia University, Graduate School of Arts &
Sciences

- 1981-1982 Columbia University, College of Physicians & Surgeons, Master of Science (M.S.)

- 1977-1981 Allegheny College, Meadville PA, Bachelor of Arts (B.A.) (Psychology - Computer
Science)

Professional Licenses

Current

Licensed Attorney in South Carolina
 Licensed Attorney in District of Columbia
 Licensed Attorney and Counselor at Law in New York

Previous

Licensed as a Private Investigator in South Carolina and New York (2002-2008), South Carolina
 State Constable (Sworn, 2008-2019).

Experience (Selected)

- 2016 – Present, Senior Attorney, Abrams Cyber Law & Forensics, LLC. Mount Pleasant, SC 29466. Concentration on Electronic Privacy and Defamation Cases, Electronic Discovery, and Digital Forensics.
- 2018 - Continuing Legal Education Instructor, *Electronic Privacy Violations during Divorce: Legal and Ethical Guidelines for Family Law Practitioners*, SC Bar, Columbia SC (February 21, 2018).
- 2016 – Continuing Legal Education Instructor, *Smartphones as evidence for Personal Injury Cases*, NBI, Charleston SC (December 8, 2016).
- 2011 – 2016 Sole Practitioner Abrams Law Firm, PC. Mount Pleasant, SC 29466
- 2011 - Digital Forensics Instructor / Investigator, H-11 Digital Forensics / United States Embassy, Tirane, Albania.
- 2010 – Facilitator, Instructor, Annual In-Service Legals and CDV Training (SLED), Lowcountry Constable Association.
- 2009 – Speaker, South Carolina Association for Justice, Hilton Head, SC (August 6, 2009) Topic: Civil Discovery of E-mails after *O'Grady*
- 2009 – Digital Forensics Instructor/Investigator, H-11 Digital Forensics / United States Embassy, Mexico City, Mexico.
- 2008 – Digital Forensics Instructor/Investigator, H-11 Digital Forensics / United States Embassy, Mexico City, Mexico.
- 2008 – Faculty, SC Bar Convention – Family Law Section CLE
- 2008 – 2011 Shareholder, Abrams Millonzi Law Firm, P.C., Mount Pleasant, SC 29464
- 2007 - Presenter, “E-Discovery: Definition, FRCP Changes and Application CLE”, NBI, Charlotte, NC, December 19, 2007
- 2007 - Digital Forensics Instructor/Investigator, H-11 Digital Forensics, United States Embassy, Mexico City, Mexico
- 2007 - Presenter, “Civil to Criminal: Collaborative Computer Forensics Investigations between PIs and Law Enforcement”, GMU2007, August 9th & 10th, 2007
- 2007 - Presenter – “A South Carolina Lawyer’s Roadmap to Navigating the New Federal E-Discovery Rules,” The South Carolina Bar (CLE Division), April 13, 2007.
- 2006 - Presenter – “Typical Internet Sexual Activity and its Detection”, Family Law CLE, The South Carolina Bar (CLE Division), November 2006.
- 2006 - Instructor, “3-day Hands-on Computer Forensics Workshop”, Trident Technical College, N. Charleston, SC, CLE accredited by The South Carolina Bar, January 2006.

- 2005 - Lecturer, "Computer Forensic Introduction", Trident Technical College, CLE accredited by South Carolina Bar and CEU / In-Service hours for PIs / LE by SLED.
- 2001 - Present Steve Abrams & Company, Ltd. (dba Abrams Computer Forensics)
Licensed Private Investigator, Computer Forensics Examiner
- 1998 - 2001 Steve Abrams & Company, Ltd. Mt. Pleasant, SC, President
- 1996 - Democratic National Committee, Instructor - Southeast and Northeast Regional Schools for Congressional Campaign Managers.
- 1995 - 1999 Direct Marketers of Charleston Mt Pleasant, SC, Partner
Co-owner of Political Database Marketing Company and full service political print shop.
- 1994 - 1995 The Software Studio Mt Pleasant, SC, Owner
Owner of software development company that developed database applications for the Newspaper publishing industry.
- 1992-1993 Town of North Hempstead, Manhasset, NY, Deputy Commissioner of Finance
- 1986 - 1992 Digitron Telecommunications, Inc., Huntington, NY, Director of R&D
- 1984 - 1986 Computer Associates International., Islandia, NY, Senior Systems Programmer
- 1983 Contel Information Systems Division. Great Neck NY, Software Engineer
(Developed the first Network Forensics Applications for the DoD)

Recent Publications

Steven M. Abrams, Knowledge of Computer Forensics Is Becoming Essential for Attorneys in the Information Age, 75 N.Y. St. B. Assn. J. 8, 15 (Feb. 2003).

Steven M. Abrams, Knowledge of Computer Forensics, Essential for 21st Century Private Investigators, 16 PI Mag. 46, 59 (October 2003).

Professional Awards & Honors

2008 - Member, SLED Ad Hoc Committee on Computer Forensics

2007 - CALI Excellence for the Future Award, Aviation Law, Charleston School of Law, Fall 2006

- CALI Excellence for the Future Award, Interviewing, Counseling & Negotiation, Charleston School of Law, Fall 2006
- CALI Excellence for the Future Award, Insurance Law, Charleston School of Law, Fall 2006

_ Dean's List, Charleston School of Law, Fall 2006, Spring 2007.

2004 - "2004 SCALI Investigator of the Year"

2003 - Member, SLED Private Investigations Business Advisory Committee

Professional Associations

Member, Institute of Electrical and Electronics Engineers - IEEE

Member, Lowcountry Constables Association - LCA

Bar Association Memberships

Admitted to practice in **South Carolina, District of Columbia, and New York.**

Compensation

I receive \$425 per hour, plus mileage, travel and lodging expenses, for all Computer Forensics services and for depositions and trial testimony.

Previous Expert Testimony

I have completed over 1250 computer forensics investigations; the overwhelming majority of cases were settled and did not require me to testify.

South Carolina cases in which I was qualified in court as an expert are:

Hillburn v. Hillburn, (2001-DR-08-2354);
Smith v. Smith, (2001-DR-22-212);
Natale v. Natale, (2003-DR-10-775)
Berda v. Berda, (2003-DR-10-1899);
Murphy v. Murphy (2004-DR-10-1510) and
Overstolz v. Fountain of Youth Wellness Centers LLC (2003-CP-10-000761).
Gitter v. Gitter (2008-DR-10-2865)
Ricigliano v. Ricigliano, (2009-DR-18-0102)
Edwards v Junevicus, (2010-DR-10-4736)
BTM Machinery Inc. v. Michael J. Finley (2013-CP-10-4366)
Cherry v Cherry (2014-DR-10-95)
Whitfield v. Schimpf and Sweetgrass Plastic Surgery, LLC (Case No. 2017-CP-10-2758)

I was qualified as a testifying expert on digital forensics in federal court in the South Carolina Federal District Court

UHLIG, LLC, V JOHN ADAM SHIRLEY, (CIVIL ACTION No.. 6:08-1208-HFF)
GREENVILLE DIVISION
UNITED STATES OF AMERICA v. BRANDON DANIELS (CRIMINAL, 2021)
CHARLESTON DIVISION

I have also prepared expert's reports under Federal Rule 26(a)(2)(B) for the following federal civil suits filed in the United States District Court for the District of South Carolina:

Lumpkin v. Bennani, (Civil Action No. 2:03-2904-23), and
Miller v. American LaFrance Corp. (Civil Action No. 2:04-1668-23)
Microsoft v. BWC Products Inc. (Civil Action No. 2:06-CV-2023-CWH)
Quala Systems, Inc, et al., v. Bulkhall USA, Inc., et al. (Civil Action No. 2:07-CV-00673-PMD)
Mainfreight v. John Marco, et al., (Civil Action No. 9:cv00563 JFA)

And in the United States District Court for the Southern District of New York:
UNITED STATES OF AMERICA v. KEITH RANIERE (also known as "VANGUARD") and ALLISON MACK (Case 1:18-cr-00204-NGG-VMS)

I was appointed the Court's Expert in United States District Court, District of South Carolina, Rock Hill Division:

The Travelers Home and Marine Ins. Co. v. Pope, C/A No.: 0:10-cv-1688-JFA

I was qualified as a testifying computer forensics expert in North Carolina courts in: *Hollins v. Lightfoot*.

In addition, I have been deposed in the following matters over the past ten years:

Thomas & Assoc. v. Christopher Humphreys (Case No. 2018-CP-10-0455)
Catherine Cope v. Wells Fargo Bank N.A., Century 21 Properties Plus, and Jim Bailey, individually; (Case No.: 2018-CP-18-00112)
Rick Gray v. Church Mutual (2017)
Calandra v. Calandra (2004-DR-10-2675)
McLernon v. McLernon (2003-DR-10-3090)
White v. Cassidy (2004-DR-08-256)
Khoury v. Noce (2006-CP-10-001830)
Quala Systems, Inc, et al., v. Bulkhall USA, Inc., et al. (Civil Action No. 2:07-CV-00673-PMD)
Mainfreight v. John Marco, et al., (Civil Action No. 9:cv00563 JFA)
Beard v. Dunn & Dixon-Hughes et al, (Case No. 2010-CP-08-0776)
UHLIG, LLC, V JOHN ADAM SHIRLEY, (CIVIL ACTION NO. 6:08-1208-HFF)
ALTMAN, ET AL. V. FIRST CITIZENS BANK AND TRUST COMPANY (2012-CP-34-0124)

(Revised: January 29, 2023)

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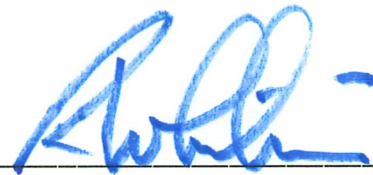
PROOF OF SERVICE

I certify that I have served the foregoing Motion to Suppress Electronic Communications, Affidavit of Petitioner in Support of Motion to Suppress Electronic Communications, and Affidavit of Steven M. Abrams, J.D., M.S. via email only on June 15, 2023 to the following addresses:

Ashby L. Jones, Esquire
Kinard and Jones, LLC
808 South Lake Drive
Lexington, South Carolina 29072
ashby@kinardandjones.com

N. ElizaBeth D. Branham, Esquire
Law Office of N. ElizaBeth D. Branham, LLC
P.O. Box 6248
West Columbia, SC 29171
beth@bethbranhamlaw.com

Honorable Huntley S. Crouch
Chief Administrative Judge
Eleventh Judicial Circuit
Lexington County Family Court
Lexington County Courthouse
605 E. Main Street
Lexington, SC 29072
huntley@hcrouchlaw.com



Richard G. Whiting, Esquire
Attorney for Petitioner
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dick.whiting@whitinglawsc.com

June 15, 2023

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A PROFESSIONAL ASSOCIATION
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SC Court of Appeals

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dick.whiting@whitinglawsc.com

June 15, 2023

VIA EMAIL ONLY

The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Megan Cronin v. William Cronin
Appellate Case No. 2023-_____

Dear Ms. Kitchings:

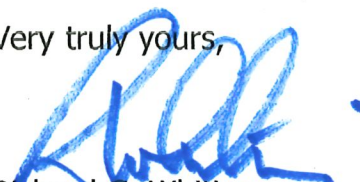
Enclosed for filing please find the Motion to Suppress Electronic Communications, Affidavit of Petitioner in Support of Motion to Suppress Electronic Communications, Affidavit of Steven M. Abrams, J.D., M. S, and Proof of Service. By copy of this correspondence, I am also serving copies of this Motion and Affidavits on Respondent's Family Court attorney, the Family Court Guardian ad Litem, and the Chief Administrative Judge for Lexington County Family Court.

Under separate cover I will be mailing my firm's check for the filing fee for this Motion.

If anything else is needed, please do not hesitate to contact my office.

With kindest regards, I am,

Very truly yours,



Richard G. Whiting

/klh

enclosures (2)

cc: Ashby L. Jones, Esquire (via email only)
N. ElizaBeth D. Branham, Esquire (via email only)
Honorable Huntley S. Crouch (via email only)