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August 29, 2023

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SC Court of Appeals

Hon. Catherine S. Harrison
S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Stonington Cmty. Ass'n, Inc. v. Carl D. Taylor
Appellate Case No. 2021-000641

Dear Ms. Harrison,

I write to call the Court's attention to an issue affecting oral arguments. The Respondent in this appeal, Stonington Community Association, Inc. (hereinafter "Stonington"), is represented by separate counsel on its claims against Appellants and on its defense of counterclaims asserted by Appellants. Specifically, my firm has been retained through insurance to defend Stonington with respect to Appellants' counterclaims only. Valerie Garcia Giovanoli represents Stonington with respect to the prosecution of Stonington claims, relevant to this appeal. This appeal concerns a grant of summary judgment on both Stonington's claims against Appellants and Appellants' counterclaims.

Because neither represents Stonington with respect to all issues on appeal, we respectfully request that this Court allow Ms. Giovanoli and me to argue our respective matters separately at the anticipated oral argument. I have conferred with Ms. Giovanoli and she consents to this request. It is my understanding that we would reach an agreement among ourselves as to how to allocate the time allotted for Respondents.

This request is made via letter to allow adequate time for preparation. Please advise if the Court will not permit us to argue separately. If this is an issue that must be raised by motion, kindly advise and we will get a motion filed expeditiously.

Sincerely,

s/Timothy J. Newton

Timothy J. Newton

TJN/