

**RECEIVED**

**Sep 06 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

Case No. 2023-000540

Target Motors, LLC d/b/a Port City Motors,

Appellant,

v.

Grand Strand Nissan, Inc., and Grainger  
Companies, Inc. d/b/a Grainger Honda,

Defendants,

Of whom Grand Strand Nissan, Inc., is the

Respondent.

Proof of Service

I certify that I served the Initial Brief of Appellant, Appellant's Designation of Matter to Be Included in the Record on Appeal, and Rule 209 Certification on Respondent Grand Strand Nissan, Inc. today by sending a copy of the same via email to its counsel of record, Mary M. Caskey, at [mcaskey@hsblawfirm.com](mailto:mcaskey@hsblawfirm.com).

A copy of the email is attached.

September 6, 2023

s/ Brooks R. Fudenberg  
Brooks R. Fudenberg  
14 Ashe Street  
Charleston SC 29403  
843-696-8911  
Attorney for Appellant

**From:** [Brooks R. Fudenberg](#)  
**To:** [Caskey, Mary](#)  
**Cc:** [steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com); [Kovatch, Tina M](#); [Lawson, William E.](#)  
**Subject:** 2023-000540, Target Motors LLC v. Grand Strand Nissan Inc., Pl's Init. Br., Desig., etc.  
**Date:** Wednesday, September 6, 2023 8:25:47 PM  
**Attachments:** [Init Br.pdf](#)  
[3. Proof of Service. Init. Brief and Desig.pdf](#)  
[Designation of Matter and Rule 209 certificate.pdf](#)

---

Mary,

Please find attached the Initial Brief of Appellant, Appellants' Designation of Matter, and a Proof of Service, which I hereby serve upon you.

Sincerely,

Brooks R. Fudenberg  
Law Office of Brooks R. Fudenberg, LLC  
14 Ashe Street  
Charleston SC 29403  
843-696-8911  
910-401-1242 (eFax)

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL AND PRIVILEGED  
ATTORNEY-CLIENT OR ATTORNEY WORK PRODUCT INFORMATION. IF YOU ARE  
NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER AND THEN  
DESTROY THIS COMMUNICATION

---

**From:** Brooks R. Fudenberg  
**Sent:** Friday, March 31, 2023 11:28 AM  
**To:** Caskey, Mary <[mcaskey@hsblawfirm.com](mailto:mcaskey@hsblawfirm.com)>; Kovatch, Tina M <[TKovatch@TurnerPadget.com](mailto:TKovatch@TurnerPadget.com)>;  
Lawson, William E. <[WLawson@TurnerPadget.com](mailto:WLawson@TurnerPadget.com)>  
**Cc:** [steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com); Kovatch, Tina M <[TKovatch@TurnerPadget.com](mailto:TKovatch@TurnerPadget.com)>; Lawson, William  
E. <[WLawson@TurnerPadget.com](mailto:WLawson@TurnerPadget.com)>  
**Subject:** Target Motors LLC , plaintiff, et al VS Grand Strand Nissan Inc , defendant, et al

Hi, Mary,

Please find attached Plaintiff's (Appellant's) Notice of Appeal, which I hereby serve upon you.

Any questions or concerns, please let me know.

Regards,

Brooks R. Fudenberg  
Law Office of Brooks R. Fudenberg, LLC  
14 Ashe Street  
Charleston SC 29403  
843-696-8911  
910-401-1242 (eFax)

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL AND PRIVILEGED  
ATTORNEY-CLIENT OR ATTORNEY WORK PRODUCT INFORMATION. IF YOU ARE  
NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER AND THEN  
DESTROY THIS COMMUNICATION.