

**From:** [Dorothy Pierce](#)  
**To:** [Knehans, Dakota](#)  
**Cc:** [Court Of Appeals Filings](#); [Shawn Bingham](#); [Loomis, Kenan](#); [Chris Smith](#); [Mishkin, Maxwell S.](#); [Bowman, Chad R.](#)  
**Subject:** Re: Notice of Appeal-Immediately Appealable Interlocutory Order  
**Date:** Monday, September 25, 2023 5:22:32 PM

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Ms. Dakota,

I will exclude the court of appeals in my next email to you. If you have any evidence that my former attorney withdrew this motion please send it to me. I did not discuss withdrawal of this motion with my previous counsel and it was not withdrawn. There is no filing in court that says it was withdrawn.

I however understand what you are trying to do but it's dubious as always.

Thanks,

Dorothy Pierce

On Mon, Sep 25, 2023, 4:59 PM Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)> wrote:

Ms. Pierce is incorrect – this motion was withdrawn by her counsel.

Best,

Dakota



**Dakota Knehans**  
**Associate Attorney | Cozen O'Connor**  
The Promenade, 1230 Peachtree Street NE Suite 400 | Atlanta, GA 30309  
P: 404-572-2081 F: 404-602-9972  
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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Sent:** Monday, September 25, 2023 4:55 PM  
**To:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>; Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)>  
**Cc:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Shawn Bingham <[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)>; Loomis, Kenan <[kloomis@cozen.com](mailto:kloomis@cozen.com)>; Chris Smith <[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)>; Mishkin, Maxwell S. <[MishkinM@ballardspahr.com](mailto:MishkinM@ballardspahr.com)>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto:BowmanChad@ballardspahr.com)>

**Subject:** RE: Notice of Appeal-Immediately Appealable Interlocutory Order

**\*\*EXTERNAL SENDER\*\***

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Sent:** Monday, September 25, 2023 4:41 PM  
**To:** Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)>  
**Cc:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Shawn Bingham <[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)>; Loomis, Kenan <[kloomis@cozen.com](mailto:kloomis@cozen.com)>; Chris Smith <[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)>; Mishkin, Maxwell S. <[MishkinM@ballardspahr.com](mailto:MishkinM@ballardspahr.com)>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto:BowmanChad@ballardspahr.com)>  
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Clerk of Appellate Court,

Ms. Dakota got it wrong. There were two motions to reconsider filed. The motion to reconsider sanctions was filed and determined by the Circuit Court on 09/01/2023. I have appealed that order dated September 01, 2023. The Motion to reconsider an in-camera review filed on April 03, 2023, was never scheduled for a hearing since then.

The document that Ms. Dakota attached is an Immediately Appealable Interlocutory order which I have appealed. This document has already been filed with the Court of Appeals with my initial filing. The clerk already has a copy of the In-camera review motion order and a motion to reconsider which has not been determined. I'm attaching the copy filed with the Court of common pleas herein.

Ms. Dakota, Please check your records carefully.

Clerk, see attached for filing.

On Mon, Sep 25, 2023 at 4:20 PM Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)> wrote:

Thank you!

Dakota



**Dakota Knehans**

**Associate Attorney | Cozen O'Connor**

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Sent:** Monday, September 25, 2023 4:12 PM

**To:** Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>

**Cc:** Shawn Bingham <[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)>; Loomis, Kenan <[kloomis@cozen.com](mailto:kloomis@cozen.com)>; Chris Smith <[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)>; Mishkin, Maxwell S. <[MishkinM@ballardspahr.com](mailto:MishkinM@ballardspahr.com)>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto:BowmanChad@ballardspahr.com)>

**Subject:** RE: Notice of Appeal-Immediately Appealable Interlocutory Order

**\*\*EXTERNAL SENDER\*\***

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**From:** Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)>  
**Sent:** Monday, September 25, 2023 4:10 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Cc:** Shawn Bingham <[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)>; Loomis, Kenan <[kloomis@cozen.com](mailto:kloomis@cozen.com)>; Chris Smith <[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)>; Mishkin, Maxwell S. <[MishkinM@ballardspahr.com](mailto:MishkinM@ballardspahr.com)>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto: BowmanChad@ballardspahr.com)>  
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Clerk of the Appellate Court,

Please find attached the Order Denying the Motion to Reconsider referenced within the appeal. It was represented that no hearing on the Motion to Reconsider was held, but this is inaccurate.

Thank you,

Dakota



**Dakota Knehans**

**Associate Attorney | Cozen O'Connor**

The Promenade, 1230 Peachtree Street NE Suite 400 | Atlanta, GA 30309

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Sent:** Monday, September 25, 2023 3:35 PM  
**To:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Shawn Bingham <[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)>; Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)>; Loomis, Kenan <[kloomis@cozen.com](mailto:kloomis@cozen.com)>; Chris Smith <[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)>; Mishkin, Maxwell S. <[MishkinM@ballardspahr.com](mailto:MishkinM@ballardspahr.com)>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto: BowmanChad@ballardspahr.com)>  
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The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**From:** Dorothy Pierce <[dorothypierce84@gmail.com](mailto:dorothypierce84@gmail.com)>  
**Sent:** Monday, September 25, 2023 3:30 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Shawn Bingham <[sbingham@fmglaw.com](mailto:sbingham@fmglaw.com)>; Knehans, Dakota <[DKnehans@cozen.com](mailto:DKnehans@cozen.com)>; Loomis, Kenan <[kloomis@cozen.com](mailto:kloomis@cozen.com)>; Chris Smith <[csmith@clarksonwalsh.com](mailto:csmith@clarksonwalsh.com)>; Mishkin, Maxwell S. <[MishkinM@ballardspahr.com](mailto:MishkinM@ballardspahr.com)>; Bowman, Chad R. <[BowmanChad@ballardspahr.com](mailto:BowmanChad@ballardspahr.com)>  
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Clerk of Appellate Court,

Please receive the Appellant's Notice of Appeal from the Oconee County Court of Common Pleas.

The appellant has mailed hard copies of the documents with a \$250 Money Order by USPS certified mail, Tracking Number: EI549793445US. The package will arrive tomorrow.

All Parties to the litigation have been served separately and also copied in this email.

Best regards,

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