

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Court of Appeals Case No. 2018-000171  
Supreme Court Case No. 2021-000137

**RECEIVED**

**Oct 23 2023**

**S.C. SUPREME COURT**

Cleo Sanders,

Respondent

v.

Savannah Highway Automotive Company, a General Partnership  
d/b/a Rick Hendrick Dodge Chrysler Jeep Ram, Santander  
Consumer US Holdings Inc., Isiah S. White, Danny Anderson, and  
Patrick Bachrodt, Jr.,

Defendants

Of which Savannah Highway Automotive Company, a General  
Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and  
Isiah S. White are

Petitioners/Appellants.

PROOF OF SERVICE

I certify that I have served a copy Respondent Sanders' Opposition To  
Petitioners/Appellants' Request For Costs And Attorney's Fees upon Petitioners by  
serving a copy on their counsel of record, John T. Lay, Jr., via email addressed to  
jlay@gwblawfirm.com.

A copy of the email is attached.

October 23, 2023

s/C. Steven Moskos

C. Steven Moskos

C. Steven Moskos, PA

6650 Rivers Ave., Ste 210

North Charleston, SC 29406

(843) 763-5297

## Steve Moskos

---

**From:** Steve Moskos  
**Sent:** Monday, October 23, 2023 5:40 PM  
**To:** John T. Lay; Jessica Laffitte; Brooks Fudenberg (brooks.r.fudenberg@fudenberglaw.com)  
**Subject:** Sanders v. Savannah Hwy Automotive, 2021-000137  
**Attachments:** Respondent's Opposition to Appellants' Request for Costs 10-23-23.pdf; Proof of Service re Opposition to Statement of Costs 10-23-23.pdf

Counsel,

Please find attached Mr. Sanders' Opposition to Petitioners/Appellants' Motion for Costs on Appeal together with my Proof of Service.

C. Steven Moskos  
6650 Rivers Ave., Ste 210  
North Charleston, SC 29406  
843-763-5297  
[steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com)  
<https://www.moskoslawfirm.com>