

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
Circuit Court Case No. 2022-CP-26-01323

Appellate Case No. 2023-000192

RECEIVED
DEC 08 2023
SC Court of Appeals

HSS Barefoot, LLC d/b/a Century 21 Barefoot, R&G Corp. d/b/a Century 21 The Harrelson Group, Kevin Mills, individually, Mills, LLC, and Greg Harrelson, individually, Respondents,

v.

Joel D. Barber, individually and as licensed realtor, Barber Real Estate, Inc., Nicholas Fitzpatrick, as licensed realtor, Darcy Varney, individually and as broker-in-charge, eXp Realty, LLC, James Ray Lunsford, individually and as broker-in-charge, and Northgroup Real Estate, Inc., Defendants,

Of Whom Joel D. Barber is the Appellant.

PROOF OF SERVICE

I hereby certify that the **FINAL BRIEF OF APPELLANT**, the **FINAL REPLY BRIEF OF APPELLANT**, and the **RECORD ON APPEAL** (only those portions designated "Confidential – Filed Under Seal") (Bates labeled version) were served on all counsel of record via email, addressed as follows:

James K. Gilliam, Esq.
Taylor K. Voegel, Esq.
Henrietta U. Golding, Esq.
Burr & Forman LLP
jgilliam@burr.com
tvoegel@burr.com
hgolding@burr.com
Attorneys for Respondents

This the 7th day of December, 2023.

SHUMAKER, LOOP & KENDRICK, LLP

/s/ Christian H. Staples

Christian H. Staples, SC Bar No. 101470

Abigail Y. Bechtol, SC Bar No. 102414

101 South Tryon Street, Suite 2200

Charlotte, NC 28280

Telephone: 704-375-0057

Facsimile: 704-332-1197

cstaples@shumaker.com

abechtol@shumaker.com

Attorneys for Appellant

Christian H. Staples
(704) 945-2183 (Direct)
cstaples@shumaker.com

December 7, 2023

Via Federal Express and Email

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org
Tracking No.: 7743 9146 0618

RECEIVED

DEC 08 2023

SC Court of Appeals

Re: *HSS Barefoot, LLC, et al. v. Joel D. Barber, et al.*
Appellate Case No.: 2023-192

Dear Ms. Kitchings:

Enclosed for filing in connection with the above-referenced matter, please find the following:

- 1) The Record on Appeal (one (1) bound copy in two (2) volumes (Volumes I – II) and one (1) unbound copy);
- 2) Portions of the Record on Appeal designated as “Confidential” and filed under seal pursuant to the Court’s Order dated November 22, 2023, for *in camera* review (one (1) bound copy in four (4) volumes (Volumes III – VI) and one (1) unbound copy);
- 3) Final Brief of Appellant (one (1) bound copy and one (1) unbound copy);
- 4) Appellant’s Final Reply Brief (one (1) bound copy and one (1) unbound copy); and
- 5) Proof of Service for the Final Brief of Appellant, Appellant’s Final Reply Brief, and the Record on Appeal (“Confidential” portions only).

Opposing counsel is only being served with items 2-5 above, since the Record on Appeal was previously served on September 19, 2023, as reflected in the Proof of Service previously filed in this matter. The “Confidential” portions of the Record on Appeal were also served on opposing counsel on September 19, 2023, but is being re-served in a Bates stamped format.

If you require anything further, including any additional copies of any of the foregoing documents, please let me know.

South Carolina Court of Appeals
HSS Barefoot, LLC, et al. v. Joel D. Barber, et al.
December 7, 2023
Page 2 of 2

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'CS', with a long horizontal stroke extending to the right.

Christian Staples
Counsel for Appellant

Enclosures

cc: James K. Gilliam, Esq. (via email only to jgilliam@burr.com)
Taylor K. Voegel (via email only to tvoegel@burr.com)
Henrietta U. Golding (via email only to hgolding@burr.com)