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Dec 28 2023

SC Court of Appeals

2006 N. MAIN STREET
ANDERSON, SOUTH CAROLINA 29621
(864) 888-8887
daniel@injuredSC.com
www.injuredSC.com

DANIEL L. DRAISEN, ESQ.
**Licensed in SC and OK*

December 28, 2023

Hon. Jenny Abbott Kitchings,
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Kevin Dwayne Chavis vs. Vansy Saensane and Ra Cha, Inc.
C/A No. 2021-CP-23-01487
Appellate Case No. 2023-00044

Dear Mrs. Kitchings:

On December 20, 2023 I sent for filing with the Court the **Supplemental** Record on Appeal, Certification of Appellant's Counsel, along with the original Proof of Service.

I advised the Court that the Supplemental Record is being submitted to include full-sized deposition transcript pages rather than the condensed pages that were filed with the original pleading.

Today, I received a letter from the Court stating that, pursuant to Rule 212, I either needed to file a Motion or to have written consent of all counsel in order to file the Supplemental Record. Attached hereto please find the written consent of all counsel.

Please let me know if you need anything else.

With kind regards,

THE INJURY LAW FIRM, P.C.

Daniel L. Draisen
Daniel L. Draisen

DLD
Enclosures



LIFE MEMBER
MILLION DOLLAR ADVOCATES FORUM
The Top Trial Lawyers In America™



cc: Steven M. Krause, Esq.
John S. Nichols, Esq.
Helen Hiser, Esq.
Zachary S. Brown, Esq.

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Dec 28 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2023-00044
C/A No. 2021-CP-23-01487

Kevin Dwayne Chavis.....Appellant,

v.

Vansy Saensane and Ra Cha, Inc. d/b/a
Bangkok Tokyo Restaurant a/k/a
Bangkok Thai Restaurant,

of whom

Ra Cha, Inc. d/b/a Bangkok Tokyo Restaurant
a/k/a Bangkok Thai Restaurant isRespondent.

**WRITTEN CONSENT OF COUNSEL TO FILE SUPPLEMENTAL RECORD ON
APPEAL**

Pursuant to Rule 212, I hereby consent to filing the Supplemental Record on Appeal.


Daniel L. Draisen, SC Bar # 13536
2006 Main Street
Anderson, SC 29621
Phone: (864) 888-8887

Steven M. Krause, SC Bar # 3571
207 East Calhoun Street,
Anderson, SC 29621
Phone: (864) 225-4000

John S. Nichols, SC Bar # 4210
Bluestein Thompson Sullivan, LLC
1614 Taylor Street
Columbia, SC 29201
Phone: (803) 779-7599

Attorneys for Appellant

(see attached email from Helen Hiser giving written consent)

Helen Hiser, Esq.
Zachary S. Brown, Esq.
McAngus, Goudelock & Courie
55 E. Camperdown Way Suite 300
Greenville, South Carolina 29601

Attorneys for the Respondents

Daniel Draisen

From: Helen Hiser <helen.hiser@mgclaw.com>
Sent: Thursday, December 28, 2023 2:10 PM
To: Daniel Draisen
Subject: FW: Kevin D. Chavis v. Vansy Saensane 2023-000440
Attachments: DS Chavis v. Saesane- Letter 12.27 Corrected.pdf

Daniel, You have my written consent, in case you need it again.
Thanks, and Happy New Year,
Helen



Helen Hiser, Attorney
helen.hiser@mgclaw.com
10 Brook Street Suite 200
Asheville, NC 28803
Main:843-576-2900 | Direct:843-576-2930 | Fax:843-534-0605
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From: Staley, Denesha <dstaley@sccourts.org>
Sent: Thursday, December 28, 2023 1:58 PM
To: Daniel Draisen <daniel@Injuredsc.com>; steve@krauselaw.org; Zachary S. Brown <Zachary.Brown@mgclaw.com>; Helen Hiser <helen.hiser@mgclaw.com>; jtankersley@clawsonandstaubes.com
Cc: kathy@injuredsc.com; debra@krauselaw.org; Cheryl Cutlip <Cheryl.Cutlip@mgclaw.com>; Anna Yeandel <Anna.Yeandel@mgclaw.com>; gmay@clawsonandstaubes.com
Subject: Kevin D. Chavis v. Vansy Saensane 2023-000440

Good afternoon,

Attached please find correspondence from the South Carolina Court of Appeals. **Please do not respond to this email.** Send all correspondence to ctappfilings@sccourts.org. Any parties not included in this email will receive the attached correspondence via US Mail.

Denesha M. Staley
Appeals Specialist II
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201
(803)-734-1079

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## Daniel Draisen

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**From:** Helen Hiser <[helen.hiser@mgclaw.com](mailto:helen.hiser@mgclaw.com)>  
**Sent:** Tuesday, December 19, 2023 3:56 PM  
**To:** Daniel Draisen  
**Cc:** Zachary S. Brown; Steven Krause; John Nichols; Jeffrey Kuykendal  
**Subject:** RE: Chavis v. Saensane 2023-00044

Daniel, We are in receipt of your filed Record on Appeal. While the Exhibit to Defendant Bangkok's Memorandum of Law in Support of Summary Judgment, filed with the circuit court on Jan. 25, 2023 was a condensed version of Saensane's deposition, the Court of Appeals requires that for "All papers or documents filed with the appellate court ... Type size shall be standard 12-point or larger" and "with the exception of exhibits as provided in Rule 210(f), no photographic reduction of the Record on Appeal, brief or other paper is acceptable which reduces the size of the alphabet below that of pica type." Rule 267(c), SCACR. The condensed version of Saensane's deposition on pages 66-86 is in violation of this rule. Rather than reprinting the entire ROA, you could file a Supplemental ROA, and submit Saensane's deposition transcript in full version. Or, you can refile the entire ROA with the full-sized version, but that would require a lot more time and money. If you do not have a full-size version of her deposition transcript, I will be happy to provide that.

Please let me know asap whether you are amenable to just filing a Supplemental Record on Appeal, or whether you will force us to have to file a Motion to Strike.

Thanks,  
Helen



**Helen Hiser, Attorney**  
[helen.hiser@mgclaw.com](mailto:helen.hiser@mgclaw.com)  
10 Brook Street Suite 200  
Asheville, NC 28803  
Main:843-576-2900 | Direct:843-576-2930 | Fax:843-534-0605  
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