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Jan 08 2024

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 Appellant's Amended Initial Reply Brief on Respondent Grand Strand Nissan, Inc. today by sending a copy of the same via email to its counsel of record, Sarah P. Spruill, at [sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com).

A copy of the email is attached.

January 7, 2024

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

**From:** [Brooks R. Fudenberg](#)  
**To:** [Spruill, Sarah](#); [Caskey, Mary](#)  
**Cc:** [Steve Moskos](#)  
**Subject:** RE: 2023-000540, Target Motors LLC v. Grand Strand Nissan Inc., Reply Br  
**Date:** Sunday, January 7, 2024 4:08:26 PM  
**Attachments:** [Init. Reply Br \(amended\).pdf](#)

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Sarah,

Please find attached an amended version of Appellant's Initial Reply Brief, 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

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**From:** Brooks R. Fudenberg  
**Sent:** Friday, January 5, 2024 9:22 PM  
**To:** Spruill, Sarah <[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)>  
**Cc:** Steve Moskos <[steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com)>  
**Subject:** 2023-000540, Target Motors LLC v. Grand Strand Nissan Inc., Reply Br

Sarah,

Please find attached Appellant's Initial Reply Brief, which I hereby serve upon you.

I hope you had a good holiday season.

Sincerely,

Brooks R. Fudenberg  
Law Office of Brooks R. Fudenberg, LLC  
14 Ashe Street

Charleston SC 29403  
843-696-8911  
910-401-1242 (eFax)

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**From:** Spruill, Sarah <[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)>  
**Sent:** Wednesday, December 27, 2023 11:41 AM  
**To:** Brooks R. Fudenberg <[Brooks.R.Fudenberg@FudenbergLaw.com](mailto:Brooks.R.Fudenberg@FudenbergLaw.com)>  
**Subject:** Automatic reply: 2023-000540, Target Motors LLC v. Grand Strand Nissan Inc., Pl's Init. Br., Desig., etc.

I will be out of the office through the end of the day on December 27. I may be slower than usual in responding to emails until my return.

Wishing you a very happy holiday season!

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