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Jan 19 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 which Grand Strand Nissan, Inc., is the

Respondent.

Supplemental Designation of Matter
to Be Included in the Record on Appeal

Appellant designates the following to be included in the Record on Appeal:

Form 4 Order Denying Target's Motion to Reconsider, filed March 3, 2023

January 18, 2024

s/ Brooks R. Fudenberg

Brooks R. Fudenberg

LAW OFFICE OF BROOKS R. FUDENBERG, LLC

14 Ashe Street

Charleston, SC 29403

Brooks R. Fudenberg@Fudenberglaw.com

843-696-8911

Certificate of Compliance with Rule 209(c)

I certify that this Supplemental Designation of Matter to Be Included in the Record on Appeal contains no matter which is irrelevant to the appeal.

January 18, 2024

s/ Brooks R. Fudenberg

Brooks R. Fudenberg

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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 the Supplemental Designation of Matter to Be Included in the Record on Appeal, and Rule 209 Certification on Respondent Grand Strand Nissan, Inc. today by sending a copy of the same via email to its counsel of record, Mary M. Caskey, at mcaskey@hsblawfirm.com.

A copy of the email is attached.

January 19, 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](#)
Subject: RE: Target Motors--
Date: Friday, January 19, 2024 8:15:53 AM
Attachments: [Supplemental Designation of Matter and Rule 209 certificate.pdf](#)

Thank you. It is attached as service upon your client.

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

From: Spruill, Sarah <sspruill@hsblawfirm.com>
Sent: Friday, January 19, 2024 7:34 AM
To: Brooks R. Fudenberg <Brooks.R.Fudenberg@FudenbergLaw.com>
Cc: Caskey, Mary <mcaskey@hsblawfirm.com>; Steve Moskos <steve@moskoslawfirm.com>
Subject: Re: Target Motors--

Yes. We consent. Thanks,
Sent from my iPhone

On Jan 18, 2024, at 10:35 AM, Brooks R. Fudenberg
<Brooks.R.Fudenberg@fudenberglaw.com> wrote:

Hi,

I spoke with the Court of Appeals Clerk's office. They said to file a supplemental designation of matter, and to state in the cover letter Respondent's counsel consent. Do I have your consent to file the attached?

Thanks.

Brooks R. Fudenberg

Law Office of Brooks R. Fudenberg, LLC
14 Ashe Street
Charleston SC 29403
843-696-8911
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From: Spruill, Sarah <sspruill@hsblawfirm.com>
Sent: Friday, January 12, 2024 1:27 PM
To: Brooks R. Fudenberg <Brooks.R.Fudenberg@FudenbergLaw.com>
Subject: Target Motors--

Got your message. That's fine.

[<image001.gif.attachctrl>](#)

Sarah P. Spruill | Attorney
Direct 864.240.3220 | sspruill@hsblawfirm.com
Haynsworth Sinkler Boyd, P.A.
ONE North Main, 2nd Floor | Greenville, SC 29601
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<Supplemental Designation of Matter and Rule 209
certificate.pdf.attachctrl>

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SC Court of Appeals

LAW OFFICE OF BROOKS R. FUDENBERG, LLC

14 Ashe Street
Charleston, South Carolina 29403
BRF@Fudenberglaw.com
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eFax: 1-910-401-1242

January 19, 2024

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
VIA EMAIL: ctappfilings@sccourts.org

RE: Target Motors, LLC v. Grand Strand Nissan, Inc.
Case No. 2023-000540

Dear Ms. Kitchings:

Please find for filing a Supplemental Designation of Matter in this case. Opposing counsel has consented.

By copy of this letter, I am serving opposing counsel.

Sincerely,

s/Brooks R. Fudenberg
Brooks R. Fudenberg
Law Office of Brooks R. Fudenberg LLC
Attorney for Appellant

cc: Mary M. Caskey, at mcaskey@hsblawfirm.com.