

# SMITH ROBINSON

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Smith Robinson Holler DuBose and Morgan, LLC

COLUMBIA 2530 Devine Street, Columbia, SC 29205  
P: 803.254.5445 F: 803.254.5007

SUMTER 126 N. Main Street, Sumter, SC 29151  
P: 803.778.2471 F: 803.778.1643

CAMDEN 935 Broad Street, Camden, SC 29020  
P: 803.432.1992 F: 803.432.0784

February 9, 2024

Via Email Only – ctappfilings@sccourts.org  
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

**Feb 09 2024**

**SC Court of Appeals**

RE: Peter D. Protopapas v. Travelers Casualty  
Appellate Case No. 2021-000648  
Our File No. 19-075

Dear Ms. Kitchings:

Respondents Peter D. Protopapas, as Receiver for Starr Davis Company, and Starr Davis Company of South Carolina, Inc. object to Appellants February 9, 2024 letter to the Court. Appellants' letter is inappropriate and improperly interposes arguments in violation of Rule 208(b)(7) of the South Carolina Appellate Court Rules. Rule 208(b)(7) states that any response to a supplemental citation must be "without argument." Travelers' letter is entirely argumentative, and the Court should ignore and strike this communication. Additionally, as to Travelers' improper argument that Respondents' supplemental citation is not properly before the Court due to issue preservation, Respondents disagree and also note that this Court "may affirm any ruling, order, decision, or judgment upon any ground(s) appearing in the Record on Appeal." Rule 220(c), SCACR.

Sincerely,



Shanon N. Peake

SNP/dlf

cc: Matthew Todd Carroll, *via email only*  
Mary Elizabeth O'Neil, *via email only*  
Harry Lee, *via email only*