



# CLEMENT RIVERS, LLP

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March 13, 2024

**VIA EMAIL ONLY**

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

**RECEIVED**

**Mar 13 2024**

**SC Court of Appeals**

Re: Heather Donaghy, as Personal Representative of the Estate of Shirley Smiley  
Potter, deceased v. 4520 Corp., Inc., et al.  
Appellate Case No.: 2024-000348  
Case No.: 2023-CP-40-03108  
YCR File: 17800-20230599

Dear Ms. Kitchings:

Please be advised that we have already received all relevant transcripts necessary for the above-referenced appeal before the filing of the Notice of Appeal in this present matter. By our calculations, our Initial Brief and Designation of Matter to be Included in the Record on Appeal are due April 3, 2024.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Stephen L. Brown

SLB/amj

cc: South Carolina Court Administration  
Theile B. McVey  
Jamie D. Rutkoski  
Aaron D. Chapman  
David C. Humen  
Peter D. Protopapas  
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Brian M. Barnwell