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Mar 13 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable Marvin H. Dukes, III, Master-In-Equity

Case No.: 2022-CP-07-00967

Rachel M. Polite a/k/a Rachel Chaplin..... Respondent

v.

Karen P. PoliteAppellant

RETURN TO APPELLANT’S “COPIES OF POTENTIAL [SIC] OF INTEREST 02/27/2024”

On February 27, 2024, Appellant served upon Respondent her “Copies of Potential [sic] of Interest 02/27/2024” document. Respondent objects. Appellant is asking this court to consider matters not raised in the Appellant’s Brief and documents not included in the Record on Appeal.

Be that as it may, the undersigned counsel is compelled to respond to Karen Polite’s allegations regarding a conflict of interest. Karen Polite was a witness for the Plaintiff in Ritter v. Mouzone, Beaufort County, South Carolina Case No. 2008-CP-07-1636. Eversole Law Firm represented the Plaintiff in the action. An associate attorney employed with Eversole Law Firm litigated the case and to the best of my recollection, I personally had no interaction much less a personal relationship with Karen Polite. There is no conflict of interest with Karen Polite.

Respectfully Submitted,

EVERSOLE LAW FIRM, P.C.

By: 
Alysoun M. Eversole, SC Bar #0068011
1509 King Street
Beaufort, SC 29902
Telephone (843)379-3333
aeversole@eversolelaw.com
Attorney for Respondent Rachel Polite

Beaufort County, South Carolina
13 day of March, 2024

Karen P. Polite
P.O. Box 213
St, Helena Island, SC 29920
(843)321-3722
Appellant Karen P. Polite, Pro-se

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PROOF OF SERVICE

The undersigned counsel hereby certifies that she has served the foregoing Return to Appellant’s “Copies of Potential [sic] of Interest 02/27/2024” upon Appellant, Pro-se by affixing same with proper postage and placing same with the United States Postal Service on the 13th day of March, 2024 addressed to the following:

Karen P. Polite
P.O. Box 213
St. Helena Island, SC 29920
Appellant Karen P. Polite, Pro-se

EVERSOLE LAW FIRM, P.C.

By: 
Alysoun M. Eversole, Esq.
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Beaufort, SC 29902
Telephone (843)379-3333
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Attorney for Respondent Rachel Polite