

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case No. 2023-001661

Brandi ClarksonAppellant,

v.

J. King Real Estate, LLC and Jason Ernest King, Respondents.

**RESPONDENTS’ MOTION TO CORRECT THE COURT’S RECORDS TO REFLECT
THAT KEVIN DESMOND MARONEY, ESQ. IS NOT COUNSEL FOR RESPONDENTS**

Pursuant to Rules 240, SCACR, the Respondents, through their undersigned attorney, hereby moves this Court for an Order correcting the records of the South Carolina Court of Appeals to reflect that Kevin Desmond Maroney, Esq. is not an attorney that has represented or is representing Respondents in this appeals. The grounds for this Motion are as follows:

1. The undersigned affirms that Kevin Desmond Maroney, Esq. (“Mr. Maroney”) is a former employee of Rogers Lewis Jackson & Mann, LLC.
2. The undersigned affirms that Mr. Maroney did not appear of record in any pleading filed on behalf of the Respondents in the proceedings before the trial court. He did appear in the early portion of the proceedings before the lower court for the purposes of certain motions and discovery, but the undersigned’s work and billing records reflect that Mr. Maroney has not performed any work for Respondents since January 8, 2022.
3. The undersigned affirms that Mr. Maroney did not represent the Respondents in the

- trial of this case that is currently on appeal. Likewise, Mr. Maroney did not represent the Respondents in any of the post-trial proceedings before the trial court.
4. The undersigned affirms that Mr. Maroney was not served a copy of the Notice of Appeal filed by the Appellant; only the undersigned received service of the Notice.
 5. The undersigned affirms that Mr. Maroney has not appeared of record on any filing in this appeal made on behalf of the Respondents, including Respondents' Initial Brief and Designation of Matter; at no time has Mr. Maroney participated as an attorney for the Respondents in the handling of any part of this appeal.
 6. The undersigned affirms that Mr. Maroney currently works for another law firm other than Rogers Lewis Jackson & Mann, LLC. Neither Mr. Maroney nor his firm has any engagement agreement or legal relationship of any kind with the Respondents.
 7. Respondents cannot require Mr. Maroney to file a Motion to be Relieved as Counsel, as they lack a representative relationship with Mr. Maroney; and the undersigned does not wish to misrepresent Mr. Maroney's involvement by listing him as representing Respondents in any filing in this appeal when he has not engaged in that representation.
 8. The undersigned affirms that he is Respondents' sole legal counsel in this appeal.

WHEREFORE, Respondents respectfully request that the Court's records be updated to reflect that Kevin Desmond Maroney, Esq. is not a counsel of record in this action for Respondents.

s/ Shaun C. Blake
Shaun C. Blake, Esq.
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April 2, 2024

COUNSEL FOR RESPONDENTS

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SC Court of Appeals

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PROOF OF SERVICE

In accordance with Rule 262, SCACR, and the Order of the South Carolina Supreme Court RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), the undersigned has served *Respondents' Motion to Correct the Court's Records to Reflect that Kevin Desmond Maroney, Esq., is not Counsel of Record for Respondents* by emailing the same to J. Gregory Studemeyer, appellate counsel of record for the Appellant, at his AIS email address, greg@studemeyerlawfirm.com

Respectfully submitted,

s/ Shaun C. Blake

Shaun C. Blake, Esq.

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April 2, 2024

COUNSEL FOR RESPONDENTS