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May 09 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2023-001431
Charleston County Case No. 2019-CP-10-02894

Roi-Tan Enterprises, LLC,

Respondent,

v.

Akim Anastopoulo and Anastopoulo Law Firm, LLC,

Appellants.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Appellant's Record on Appeal by Electronic Mail on May 9, 2024, addressed to the Respondents' attorney of record: Arthur Cole Pelzer, arthur@pelzerlawfirm.com, of the Pelzer Law Firm, LLC.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

/s/ Eric M. Poulin

Eric M. Poulin (SC Bar # 100209)

Lane D. Jefferies (SC Bar # 101764)

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***ATTORNEYS FOR THE
APPELLANTS***

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<Cover Letter to the SC Court of Appeals, 03.20.24.pdf><Motion for SC Court of Appeals Order & Exhibit A, 03.20.24.pdf><Proof of Service, 03.20.24.pdf>

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May 9, 2024

Sent via Email to Ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: *Roi-Tan Enterprises v. Anastopoulo, et al.*
Case No.: 2023-001431

Dear Ms. Kitchings:

Enclosed for filing, please find Appellant's Record on Appeal and the associated Proof of Service.

Additionally, please see attached a letter from attorney Lane Jefferies listing the documents that Appellant is asking Respondent to send, pursuant to their Motion for an Order to Require Appellants to Submit a Complete and Proper Record on Appeal dated March 20, 2024.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

s/ Kelsey Pratt

Kelsey Pratt
Litigation Paralegal

Cc: Arthur Pelzer
S.C. Bar No.: 71153
266 Meeting Street
Charleston, SC 29401
arthur@pelzerlawfirm.com

CENTRAL MAILING (SOUTHEAST REGION):
32 Ann Street, Charleston, SC 29403

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Clerk of Court, South Carolina Court of Appeals
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Columbia, SC 29211

RE: *Roi-Tan Enterprises v. Anastopoulo, et al.*
Case No.: 2023-001431

Dear Ms. Kitchings,

I am writing to bring to the court's attention that Appellant attempted to include the materials requested by the Appellee, but the Appellee refused to provide them to us (Please see the attached email, to which Appellee never responded). Obviously, we cannot include a document in the Record on Appeal if we do not have it or cannot figure out what document the Appellee is referring to.

As a result, we would respectfully request that if this Court determines that it is appropriate to order Appellant to include the documents referred to in Appellee's Motion to Correct, that the Court *also* order Appellee to provide the documents, so that it will be possible for Appellant to include them in the amended Record on Appeal.

Sincerely,



Lane Jefferies

cc: all counsel of record

CENTRAL MAILING (SOUTHEAST REGION):
32 Ann Street, Charleston, SC 29403

From: Lane Jefferies lane@poulinwilley.com
Subject: Re: Roi-Tan Enterprises v. Anastopoulo - # 2023-001431
Date: March 22, 2024 at 10:05
To: Arthur@pelzerlawfirm.com
Cc: Eric Poulin eric@akimlawfirm.com, Allison MacPherson allison.macpherson@poulinwilley.com, Kelsey Pratt kelsey.pratt@poulinwilley.com, Carla Muller carla@pelzerlawfirm.com



Dear Arthur —

I hope this email finds you well. In response to your motion we are revising the Record on Appeal. To avoid any further confusion or necessary back-and-forth, we'd respectfully request that you send us copies of several items (I don't want to be in the business of having to guess what you mean, and end up including either too much or too little). If you would provide PDF's of the following we will make sure to include them*:

12. E-mails from Counsel for Appellants dated June 14, 2023;
13. E-mails from Counsel to Lower Court dated June 14, 2023;
14. E-mails from Counsel for Appellants and Respondent dated June 28, 2023;
21. Appellants' Second Responses to Requests for Production of November 13, 2022;

Thanks in advance for your assistance. I hope you have a great weekend.

Best,
Lane

*Trusting that you presented these items to the lower court, I am presuming that you have copies thereof.

—
Lane D. Jefferies
Chief Operating Officer
Poulin | Willey | Anastopoulo
32 Ann Street
Charleston, South Carolina 29403

Lane@PoulinWilley.com

Office locations throughout the Carolinas and Georgia

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On Mar 20, 2024, at 14:27, Carla Muller <carla@pelzerlawfirm.com> wrote:

Dear Court of Appeals Filings:

Attached for filing in the above-referenced matter, please find the following: Cover Letter to the Clerk of Court, Respondent's Motion for an Order to Require Appellants to Submit a Complete and Proper Record on Appeal and for an Order to Extend Time for Respondent to File Its Final Brief, and Proof of Service. The \$50.00 filing fee will be mailed to your office.

Please contact our office if you have any questions.

Sincerely yours,

Carla Muller
Senior Paralegal / Bookkeeper

PELZER LAW FIRM, LLC