

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ADMINISTRATIVE LAW COURT  
S. Phillip Lenski, Administrative Law Judge

Case No. 23-ALJ-22-0379-AP  
Appellate Case No.: 2024-000251

Bridgette M. Chabot,

Appellant,

v.

South Carolina Department  
Of Employment and Workforce and  
Wells Fargo & Company, Inc.,

Respondents.

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**RETURN TO APPELLANT’S MOTION TO STRIKE RESPONDENT WELLS  
FARGO’S INITIAL BRIEF**

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Pursuant to Rule 240(e) of the South Carolina Appellate Court Rules, Respondent, Wells Fargo and Company, Inc. (“Wells Fargo”), hereby submits this return in response to Appellant’s Motion to Strike Respondent Wells Fargo’s Initial Brief dated June 3, 2024 (“Motion to Strike”).

In her Motion to Strike, Appellant contends Wells Fargo’s Initial Brief should be struck because it includes contested matters in the Statement of the Case. However, Appellant fails to provide any supporting authority for her request to strike Respondent’s Initial Brief, and neither the South Carolina Appellate Court Rules, nor extant case law, justify striking Respondent’s Initial Brief on these grounds.

Moreover, Appellant’s contention that the matters described in Respondent’s Statement of the Case are contested is without merit. The “Factual Background” included in Respondent’s Statement of the Case is adequately supported by citations to the record, including testimony before the Administrative Hearing Officer. Appellant’s attempts to contest the “Factual

Background” portion of Respondent’s Initial Brief—to the extent Appellant can support her arguments with record evidence—are arguments to be raised in a Reply Brief. Appellant’s efforts to raise disputes as to the record evidence in this case are not grounds to strike Respondent’s Initial Brief. Therefore, Wells Fargo respectfully requests that the Court deny Appellant’s Motion to Strike.

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*Counsel for Respondent  
Wells Fargo and Company, Inc.*

Dated this 11th day of June, 2024

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**Jun 11 2024**

**SC Court of Appeals**

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Bridgette Chabot ..... Appellant

v.

South Carolina Department of Employment and  
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**CERTIFICATE OF SERVICE**

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I certify that I have served the Return to Appellant’s Motion to Strike Respondent Wells Fargo Initial Brief by emailing a copy to all parties and depositing a copy of the communication in the United States Mail, postage prepaid, on June, 11, 2024, addressed as follows:

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**[Signature page to follow]**

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