

The State of South Carolina
In the Supreme Court

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Jun 21 2024

S.C. SUPREME COURT

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas for the First Circuit

The Honorable Diane S. Goodstein

Case No.: 2022-CP-18-00295
Appellate Case No.: 2023-000655

LAURA ABERNATHY..... Plaintiff /Petitioner,

v.

ERVIN W. LAMBERT, SR., PERSONAL REPRESENTATIVE OF THE ESTATE OF ERVIN
E. LAMBERT, JR., DECEASED,.....Defendant/Respondent.

PROOF OF SERVICE

I certify that I have served the Petition for Writ of Certiorari on opposing counsel
via e-mail this 21st day of June, 2024, addressed to Respondent’s attorneys of record as follows:

Lionel S. Lofton, Esq. – lionel@loftonandlofton.com

V. Lynn Lofton, Esq. – lynn@loftonandlofton.com

A copy of the e-mail is attached to this Proof of Service as Exhibit A.

By s/Angela

Angela Gross
Legal Assistant to
Jaan G. Rannik
46A State Street, Charleston, SC 29401
Phone: 843-377-1871; Fax: 843-377-1310

EXHIBIT A

From: [Angela Gross](#)
To: "lynn@loftonandlofton.com"; "lionel@loftonandlofton.com"
Cc: [Jaan Rannik](#); [Angela Gross](#)
Subject: Abernathy v. Lambert / Appellate Case No.: 2023-000655
Date: Friday, June 21, 2024 2:53:00 PM
Attachments: [2024 06 21 - LT Supreme Court filing Petition for Certiorari.pdf](#)
[2024 06 21 - Petition for Writ of Certiorari.pdf](#)
[Ex. 1 - 2020 06 12 - Summons and Complaint with exhibit.pdf](#)
[Ex. 2 - 2020 09 20 - Motion to Amend Complaint.pdf](#)
[Ex. 3 - 2022 12 19 - Order Denying Motion to AMEND.PDF](#)
[Ex. 4 - 2022 10 14 - Summons and Complaint \(Wrongful Termination\).pdf](#)
[Ex. 5 - 2023 03 16 - Amended Summons and Complaint.pdf](#)
[Ex. 6 - 2023 03 17 - Motion to CONSOLIDATE.pdf](#)
[Ex. 7 - 2023 04 12 - Form 4 - Order Denying Motion to CONSOLIDATE.pdf](#)
[Ex. 8 - Notice of Appeal.pdf](#)
[Ex. 9 - 2024 01 10 - Order Granting Motion to Dismiss.pdf](#)
[Ex. 10 - 2024 02 09 - Petition for Rehearing \(003\).pdf](#)
[Ex. 11 - 2024 05 14 - Order Denying Petition for Rehearing.pdf](#)
[Ex. 12 - 2023 10 26 - Respondent's Motion to Dismiss and Memo of Law.10262023.pdf](#)

Lynn and Lionel,

Attached for service, please find the Petition for Writ of Certiorari together with the exhibits (1-12) in the above-referenced appeal. The Proof of Service will follow under separate email cover.

Please disregard my email below because it did not include the exhibits. I apologize for any inconvenience.

With kindest regards,



Angela Gross
Legal Assistant to Andrew K. Epting, Jr., Esq.
Jaan G. Rannik, Esq.
Clinton T. Magill, Esq.
EPTING & RANNIK, LLC
46A State Street
Charleston, SC 29401
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agg@epting-law.com

From: Angela Gross
Sent: Friday, June 21, 2024 2:46 PM
To: lynn@loftonandlofton.com; lionel@loftonandlofton.com
Cc: [Jaan Rannik <jgr@epting-law.com>](mailto:jgr@epting-law.com); [Angela Gross <agg@epting-law.com>](mailto:agg@epting-law.com)

Subject: Abernathy v. Lambert / Appellate Case No.: 2023-000655

Dear Counsel:

Attached for service please find the Petition for Writ of Certiorari in the above appeal. A proof of service will follow under separate email.

With kindest regards,



Angela Gross
Legal Assistant to Andrew K. Epting, Jr., Esq.
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