

From: [Lee Weiland](#)
To: [Court Of Appeals Filings](#)
Cc: [Justin Lucey](#); [Joshua Evans](#); [kbattle@battlelawsc.com](#); [mbattle@battlelawsc.com](#); [andrew@ldh-law.com](#); [jennifer@ldh-law.com](#); [lthomas@richardsonplowden.com](#); [ljennelle@richardsonplowden.com](#); [Carmen Ganjehsani](#); [Sohayla Townes](#); [Jennifer Zambriczki](#)
Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Initial Brief, Designations of Matter, and Proof of Service
Date: Thursday, July 11, 2024 6:02:27 PM
Attachments: [20240711 Appellant's Initial Brief and POS.pdf](#)
[20240711 Appellant's Designation of Matter.pdf](#)

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. *******

Good afternoon:

Please find attached for filing Appellant's Initial Brief, Designations of Matter, and Proof of Service for the above-referenced matter.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
www.lucey-law.com

From: Lee Weiland
Sent: Thursday, June 27, 2024 12:35 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Cover Letter and Fourth Motion for Extension of Time

Good afternoon:

Please find attached for filing Appellant's cover letter and Fourth Motion for Extension of Time to File the Initial Brief and Designation of Matter.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427

www.lucey-law.com

From: Lee Weiland

Sent: Thursday, June 13, 2024 4:14 PM

To: 'Court Of Appeals Filings' <ctappfilings@sccourts.org>

Cc: Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; 'kbattle@battlelawsc.com' <kbattle@battlelawsc.com>; 'mbattle@battlelawsc.com' <mbattle@battlelawsc.com>; 'andrew@ldh-law.com' <andrew@ldh-law.com>; 'jennifer@ldh-law.com' <jennifer@ldh-law.com>; 'lthomas@richardsonplowden.com' <lthomas@richardsonplowden.com>; 'ljennelle@richardsonplowden.com' <ljennelle@richardsonplowden.com>; Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Cover Letter and Third Motion for Extension of Time

Good afternoon:

Please find attached for filing Appellant's cover letter and Third Motion for Extension of Time to File the Initial Brief and Designation of Matter.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
www.lucey-law.com

From: Lee Weiland

Sent: Monday, May 13, 2024 1:56 PM

To: 'Court Of Appeals Filings' <ctappfilings@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; 'kbattle@battlelawsc.com' <kbattle@battlelawsc.com>; 'Mike Battle' <mbattle@battlelawsc.com>; 'Andrew Lindemann' <andrew@ldh-law.com>; 'jennifer@ldh-law.com' <jennifer@ldh-law.com>; 'lthomas@richardsonplowden.com' <lthomas@richardsonplowden.com>; 'ljennelle@richardsonplowden.com' <ljennelle@richardsonplowden.com>; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Cover Letter and Second Motion for Extension of Time

Good afternoon:

Please find attached for filing Appellant's cover letter and Second Motion for Extension of Time to File the Initial Brief and Designation of Matter.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
www.lucey-law.com

From: Lee Weiland
Sent: Friday, April 12, 2024 9:27 AM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>
Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Cover Letter and Motion for Extension of Time

Good morning:

Please find attached for filing Appellants' cover letter and Motion for Extension of Time to File the Initial Brief and Designation of Matter.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
www.lucey-law.com

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Friday, March 1, 2024 1:53 PM
To: Lee Weiland <lweiland@lucey-law.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>
Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Letter Enclosing Motion Filing Fee

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Lee Weiland <lweiland@lucey-law.com>

Sent: Friday, March 1, 2024 1:30 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Letter Enclosing Motion Filing Fee

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Good afternoon,

Please find attached for filing Appellant's Letter to the S. C. Court of Appeals regarding the filing fee for Appellant's abeyance motion.

Thank you,
Lee

Lee Weiland

Senior Paralegal

Justin O'Toole Lucey, P.A.

Direct: (912) 228-8427

<https://link.edgепilot.com/s/b28e0b68/8bseyJkJhEK9xtUlsdQHow?u=http://www.lucey-law.com/>

From: Court Of Appeals Filings <ctappfilings@sccourts.org>

Sent: Thursday, February 29, 2024 8:27 AM

To: Lee Weiland <lweiland@lucey-law.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Motion To Stay Briefing Pending Editing of Transcript

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Lee Weiland <lweiland@lucey-law.com>

Sent: Wednesday, February 28, 2024 5:04 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Appellant's Motion To Stay Briefing Pending Editing of Transcript

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Good afternoon,

Please find attached for filing Appellant's Motion to Stay Briefing Pending Editing of Transcript for the above-referenced matter.

Thank you,
Lee

Lee Weiland

Senior Paralegal

Justin O'Toole Lucey, P.A.

Direct: (912) 228-8427

<https://link.edgепilot.com/s/42eea31d/ymobzzNe1UGsyna3UyZt8A?u=http://www.lucey-law.com/>

From: Court Of Appeals Filings <ctappfilings@sccourts.org>

Sent: Wednesday, February 28, 2024 10:38 AM

To: Justin Lucey <jlucey@lucey-law.com>; Todd, Sallie B. <sbtodd@sccourts.org>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Justin Lucey <jlucey@lucey-law.com>

Sent: Wednesday, February 28, 2024 10:37 AM

To: Todd, Sallie B. <sbtodd@sccourts.org>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey <jlucey@lucey-law.com>

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Ms. Todd,

Attached please find various transcript excerpts where the speakers appear to be mis identified or words appear to be missing.

At this time, we have only gotten through several sections of the transcript, and will continue working our way though it to see if there are other areas of concern.

Please advise when you will have an opportunity to check these areas and when we should expect to hear from you.

Justin Lucey

From: Todd, Sallie B. <sbtodd@sccourts.org>

Sent: Tuesday, February 27, 2024 10:09 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>

Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Please find the attached letter dated 2/27/2024 in response to the letter from Mr. Lucey dated 2/23/2024.

If you need anything further from me, please let me know.

Thanks,
Sallie Beth Todd

From: Court Of Appeals Filings <ctappfilings@sccourts.org>

Sent: Friday, February 23, 2024 1:45 PM

To: Lee Weiland <lweiland@lucey-law.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Todd, Sallie B. <sbtodd@sccourts.org>; Transcripts <transcripts@sccourts.org>

Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com <kbattle@battlelawsc.com>; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com <jennifer@ldh-law.com>; lthomas@richardsonplowden.com <lthomas@richardsonplowden.com>; ljennelle@richardsonplowden.com <ljennelle@richardsonplowden.com>; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com <Lynn@clarkbolen.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Lee Weiland <lweiland@lucey-law.com>

Sent: Friday, February 23, 2024 1:44 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Todd, Sallie B. <sbtodd@sccourts.org>; Transcripts <transcripts@sccourts.org>

Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Ms. Todd:

Good afternoon. Please find attached correspondence sent on behalf of Justin Lucey concerning the above-referenced matter.

Thank you,
Lee

*Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.*

Direct: (912) 228-8427

<https://link.edgепilot.com/s/64ee6eb3/pc8d2scayEiLO9miPhZytA?u=http://www.lucey-law.com/>

From: Lee Weiland

Sent: Thursday, February 15, 2024 1:59 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Todd, Sallie B. <sbtodd@sccourts.org>; transcripts@sccourts.org

Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Dear Ms. Todd:

Good afternoon. Thank you for the delivery of the trial transcript regarding the above-referenced case. After review, we have noticed several transcription issues. Therefore, we request a time to listen to the tapes and that all tapes be preserved until further notice.

We look forward to hearing from you and/or the Court on how to proceed with correcting the transcript.

Sincerely,
Lee

Lee Weiland

Senior Paralegal

Justin O'Toole Lucey, P.A.

Direct: (912) 228-8427

<https://link.edgепilot.com/s/64ee6eb3/pc8d2scayEiLO9miPhZytA?u=http://www.lucey-law.com/>

From: Court Of Appeals Filings <ctappfilings@sccourts.org>

Sent: Wednesday, February 14, 2024 9:32 AM

To: Lee Weiland <lweiland@lucey-law.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Received

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Lee Weiland <lweiland@lucey-law.com>

Sent: Wednesday, February 14, 2024 9:27 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com

Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Received

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Good morning,

Please find attached for filing the trial transcript and certification served upon us last night via email from the Trial Court Reporter Sallie Todd.

Thank you,
Lee

Lee Weiland

Senior Paralegal

Justin O'Toole Lucey, P.A.

Direct: (912) 228-8427

<https://link.edgепilot.com/s/66c32a3b/TJFMH6dWrU2QtWCnxKL43g?u=http://www.lucey-law.com/>

From: Todd, Sallie B. <sbtodd@sccourts.org>

Sent: Tuesday, February 13, 2024 7:22 PM

To: Joshua Evans <jevans@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.