

August 26, 2024

The Honorable Jenny Abbott Kitchings
Clerk of the Court of Appeals
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
Aug 26 2024
SC Court of Appeals

RE: *In Re: Lorraine Schueler, Appellant.*
Noah Veon, on Behalf of Himself and All Others Similarly Situated, Respondent, v. Richard James Schueler, a/k/a Richard Heart, Defendant.
Appellate Case No.: 2024-001234

Dear Ms. Kitchings:

On behalf of Appellant Lorraine Schueler, I write to you today in response to Respondent's Motion to Dismiss, filed on August 14, 2024. I believe the memorandum regarding appealability filed on August 12, 2024, as requested by the Court on July 31, 2024, sufficiently addresses the arguments raised by Respondent in his motion. Similar to Rule 208(b)(6), SCACR, Appellant adopts these arguments by reference.

Specifically, as to the argument raised in the first paragraph of Respondent's motion, Appellant addresses the argument on pages eight (8) through thirteen (13) of her memorandum. As to Respondent's second paragraph, Appellant addresses the argument on pages nine (9) through eleven (11) of her memorandum. As to Respondent's third paragraph, Appellant addresses the argument on page eleven (11), footnote six (6) of her memorandum. As to Respondent's fourth paragraph, Appellant addresses the argument on pages eight (8) through thirteen (13) of her memorandum.

Thank you for your attention to this matter. Please let me know if you need anything further.

With kind personal regards,

Sincerely,

/s/ John S. Nichols

John S. Nichols, Esq.

SC Bar No. 4210

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Mark D. Chappell, Esq.
William S. Detwiler, Esq.
James D. George, Jr., Esq.
Graham L. Newman, Esq.
Andrew S. Radeker, Esq.

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Michael G. Nettles, Circuit Court Judge

Appellate Case No: 2024-001234

In Re: Lorraine Schueler, Appellant,
Noah Veon, on behalf of himself and all others similarly situated, . . . Respondent,
v.
Richard James Schueler a/k/a Richard Heart, Defendant.

PROOF OF SERVICE

I certify that I have served the response to the Motion to Dismiss upon counsel for all parties at their primary e-mail address listed in the Attorney Information System:

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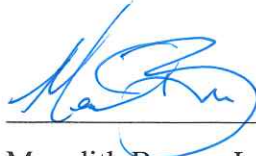
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August 26, 2024

cc: G. Murrell Smith, Jr., Esq.
Frederick Hanna, Jr., Esq.
John S. Nichols, Esq.

Meredith Brown

From: Meredith Brown
Sent: Monday, August 26, 2024 12:42 PM
To: will@chappell.law; Merritt Abney; Drew Radeker; mark@chappell.law; jgeorge@sbltv.law; graham@chappell.law
Cc: John Nichols; murrell@smithrobinsonlaw.com; fred.hanna@smithrobinsonlaw.com
Subject: Case No: 2024-001234 Veon v Schueler
Attachments: 2024.08.26- Response to Motion to Dismiss.pdf

Dear Counsel,

Please find attached the response to the Motion to Dismiss in the above-referenced matter.

Thank you,
Meredith



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v. Richard James Schueler, Defendant.
Appellate Case No.: 2024-001234

Dear Ms. Kitchings:

Enclosed for filing is the response to the Motion to Dismiss in the above case. I have also enclosed proof of service of this Motion upon all parties.

Thank you for your attention to this matter. Please let me know if you need anything further.

With kind personal regards,

Sincerely,

/s/ John S. Nichols

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