

RECEIVED

Sep 03 2024

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BARNWELL COUNTY
Doyet A. Early, III, Circuit Court Judge

Opinion No. 6055
Heard August 17, 2023 – Filed April 3, 2024

Lorenda Robinson, Elaine Nix, Archie Patterson,
And Tami Bollerman, Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are..... Petitioners,

v.

South Carolina Department of Employment and
Workforce, Respondent.

PROOF OF SERVICE

I certify that I have served the Petitioners’ Reply to Respondent’s Return in Opposition to
Petition for Writ of Certiorari on the following counsel of record by email, a copy of which is
attached, on September 3, 2024.

Robert E. Stepp (SC Bar #5335)
Robert E. Tyson, Jr. (SC Bar #10820)
Vordman Carlisle Traywick, III (SC Bar #102123)
ROBINSON GRAY STEPP & LAFFITTE, LLC
1310 Gadsden Street
Post Office Box 11449
Columbia, SC 29211
(803) 929-1400
rstepp@robinsongray.com
rtyson@robinsongray.com
ltraywick@robinsongray.com

William H. Davidson, II (SC Bar #1558)
Kenneth P. Woodington (SC Bar #6213)
DAVIDSON WREN & DEMASTERS, P.A.
1611 Devonshire Drive
Post Office Box 8568
Columbia, SC 29202
(803) 806-8222
wdavidson@dml-law.com
kwoodington@dml-law.com

*Counsel for Appellant-Respondent South
Carolina Department of Employment and
Workforce*

Kenneth M. Moffitt (SC Bar #74179)
Jessica J. Godwin (SC Bar #100514)
John P. Hazzard, V (SC Bar #9579)
Post Office Box 142
Columbia, SC 29201
(803) 212-6300
kenmoffitt@scsenate.gov
jessicagodwin@scsenate.gov
johnhazzard@scsenate.gov

*Counsel for Thomas Alexander,
President of the South Carolina Senate*

Patrick Dennis (SC Bar #70194)
Haley Symmes (SC Bar #100704)
Steve Davidson (SC Bar #100592)
Post Office Box 11867
Columbia, SC 29211
(803) 734-3125
patrickdennis@schouse.gov
haleymottel@schouse.gov
stevedavidson@schouse.gov

*Counsel for G. Murrell Smith
Speaker of the South Carolina House of Representatives*

C. BRADLEY HUTTO (SC Bar #6436)
Williams & Williams
1281 Russell Street, P.O. Box 1084
Orangeburg, SC 29115

Phone: 803-380-4099
Fax: 803-928-5190
cbhutto@williamsattys.com

ALEX D. PATERRA (SC Bar #75004)
The Pattera Law Firm, LLC
104 S. Calhoun Street
Greenville, S.C. 29601
864-232-2776
alex.pattera@paterrallaw.com

ADAM PROTHEROE (SC Bar #78442)
SUSAN B. BERKOWITZ (SC Bar #670)
South Carolina Appleseed Legal Justice Center
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113
(803) 779-5951 (facsimile)
adam@scjustice.org
sberk@scjustice.org

*Counsel for Respondents-Archie Patterson
And Tami Bollerman*

s/ Daniel W. Williams
DANIEL W. WILLIAMS (SC Bar #10233)
BEDINGFIELD & WILLIAMS, LLC
40 Wall Street
Post Office Box 616
Barnwell, SC 29812
(803) 259-2759
Fax: (803) 259-5922
dan@danwilliamslaw.com

*Counsel for Respondents-Archie Patterson
And Tami Bollerman*

Barnwell, South Carolina
September 3, 2024

**Lorenda Robinson, Elaine Nix, Archie Patterson, et al. vs. South Carolina
Department of Employment and Workforce; Appellate Case No. 2019-000599**

1 message

Andrea Reed <andrea@danwilliamslaw.com>

Tue, Sep 3, 2024 at 11:34 AM

To: rstepp@robinsongray.com, rtyson@robinsongray.com, Lisle Traywick <ltraywick@robinsongray.com>, wdavidson@dml-law.com, kwoodington@dml-law.com, kenmoffitt@scsenate.gov, jessicagodwin@scsenate.gov, johnhazzard@scsenate.gov, patrickdennis@schouse.gov, haleymottel@schouse.gov, stevedavidson@schouse.gov, Brad Hutto <cbhutto@williamsattys.com>, alex.pattera@paterrallaw.com, adam@scjustice.org, sberk@scjustice.org
Cc: Daniel Williams <dan@danwilliamslaw.com>

All:

Pursuant to In Re Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024, App. No. 2020-000447, dated April 24, 2024), attached for service upon you via email is the Petitioners' Reply to Respondent's Return in Opposition to Petition for Writ of Certiorari and the Proof of Service, being filed in the SC Supreme Court this afternoon.

Should you have any questions or concerns, please do not hesitate to contact me. Thanks and have a great afternoon.

Andrea S. Reed
Paralegal to Daniel W. Williams
PO Box 616
Barnwell, SC 29812
(803) 259-2759
(803) 259-5922 (fax)

CONFIDENTIALITY NOTE: This E-mail may contain privileged and confidential information and is intended solely for the use of the person or persons named above. If you are not an intended recipient, you are hereby notified that any dissemination or duplication of this E-mail is prohibited and that there shall be no waiver of any privilege or confidence by your receipt of this transmission. If you have received this E-mail in error, please notify us by collect telephone call to the number indicated above.

2 attachments

 **PETITIONERS' REPLY TO RESPONDENT'S RETURN.pdf**
5255K

 **PROOF FOR REPLY.pdf**
624K