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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Case No. 2024-000786

Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall

Respondents,

v.

William Bertram von Herrmann and The Von Herrmann Law Firm

Appellants.

**RESPONDENTS' MOTION TO BE ALLOWED
TO RESPOND TO APPELLANTS' PETITION FOR REHEARING**

Comes now, the Respondents, Anna Coggeshall, Bryan Coggeshall and Katherine Coggeshall through their undersigned counsel, moves this Court for:

1. The Appellants, Willaim Bertram von Herman and The Von Herrmann Law Firm, through their counsel, filed his *Petition for Rehearing* with this Court on August 28, 2024.
2. Pursuant to Rule 221 of the *South Carolina Rules of Appellate Procedure* no return to a petition for rehearing may be filed unless requested by the appellate court.

3. If the Respondents are allowed to file a return, pursuant to Rule 240(e) of the *South Carolina Rules of Appellate Procedure* the Respondents' return is due on September 7, 2024.
4. The Respondents requests this Court, pursuant to Rule 240(e) of the *South Carolina Rules of Appellate Procedure*, to extend the time for filing the Respondents' return from September 7, 2024, until Monday, September 23, 2024, if the Court allows the Respondents to file a return as provided in Rule 221 of the *South Carolina Rules of Appellate Procedure*

Respectfully submitted,

S/Robert E. Lee

Robert E. Lee, Esq., SC Bar No. 63052
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Counsel for Respondent

Other Counsel of Record:

Steven M. Abrams, Esq., SC Bar No. 76230
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Counsel for Respondent

Dated: September 4, 2024

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Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall

Respondents,

v.

William Bertram von Herrmann and The Von Herrmann Law Firm

Appellants.

PROOF OF SERVICE

I certify that I have served ***Respondents' Motion to Be Allowed To Respond to Appellants' Petition For Rehearing***, upon the parties below by electronic mail, addressed as follows:

Skyler C. Wilson, Esq.
Douglas W. MacKelcan, Esq.
40 Calhoun Street, Suite 400
Charleston, South Carolina 29401
swilson@csvg.com
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ATTORNEYS FOR THE APPELLANTS

This 4th day of September 2024

Respectfully submitted,

S/Robert E. Lee

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Robert E. Lee

From: Robert E. Lee
Sent: Wednesday, September 4, 2024 5:06 PM
To: Mackelcan, Douglas W.; Wilson, Skyler C.; Moran, Rosie; Rewt, Teri J.
Cc: Dick.Whiting@whitinglawsc.com; Steven Abrams; 'Kenneth Moss'; Robert E. Lee; Meredith Baxley
Subject: Appellate Case No. 2024-000786; Coggeshall v. von Herrmann; State Case No.: 2022-CP-26-06296
Attachments: 9-4-24 Ct App Motion Filing.pdf
Importance: High
Sensitivity: Confidential

Good afternoon everyone

With the attached, we are providing Appellants' with a copy of *Respondents' Motion To Be Allowed To Respond to Appellants' Petition for Rehearing* in this case, which is will be filed tomorrow. You will be copied on our email to the Court when we file the Petition. Thank you and best regards



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September 4, 2024

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Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
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VIA U.S. MAIL & E-MAIL (CTAPPFILINGS@SCCOURTS.ORG)

Re: *Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall
(Respondents) v. William Bertram von Herrmann and The Von
Herrmann Law Firm (Appellants)*

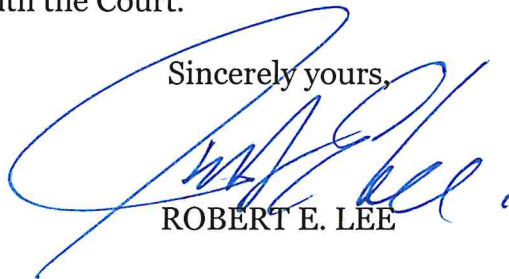
Appellate Case No.: 2024-000786

Common Please Case No.: 2022-CP-26-06296

Dear Ms. Kitchings:

Enclosed for filing find Respondents, Anna Coggeshall, Bryan Coggeshall, and Katherine Coggeshall's *Motion To Be Allowed To Respond To Appellants' Petition* for Rehearing in the above-referenced case, together with Proof of Service, and Respondents' service email to Appellants. A \$50.00 check for filing fee will follow by regular mail. If anything, further is required from Respondents currently, please advise. By copy of this letter, we are again providing the Petition to Appellants' counsel and advising of our communication with the Court.

Sincerely yours,



ROBERT E. LEE

REL:mlb

W/Enclosure

cc: Skyler C. Wilson, Esq.
Douglas W. MacKelcan, Esq.
(Via E-Mail Only)

ROBERT E. LEE, LLC
ATTORNEY - AT - LAW

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