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September 22, 2024

Hon. Jenny A. Kitchings  
Clerk of Court  
S. C. Court of Appeals  
P. O. Box 11629  
Columbia, S. C. 29211

**RECEIVED**  
**Sep 23 2024**  
**SC Court of Appeals**

RE: Appellate Case No. 2022-001114, Charleston Carriage Works, LLC v. Charleston Animal Society, *et. al.*

Dear Ms. Kitchings,

On September 18, 2024, the Supreme Court handed down “pertinent and significant authority” relevant to this appeal in *Vanessa Williams v. Jeffcoat*, \_\_\_ S.C. \_\_\_, \_\_\_ S.E.2d \_\_\_ (Op. No. 28236, Sept. 18, 24). In accordance with Rule 208(b)(7), *S. C. Appellate Court Rules*, I am requesting that the Supreme Court’s statement of the summary judgment standard be inserted into Appellant’s Initial Brief at page 17. In *Williams v. Jeffcoat*, the Supreme Court held:

As the court of appeals noted, Jeffcoat wrote in the conclusion to his motion for summary judgment, “[t]here are no disputed facts in this case.” That statement is correct—the basic facts are not in dispute. For example, there is no dispute that Williams, as guardian and conservator, conveyed the Property to herself individually, for \$10. However, as our standard of review requires, if there are genuine competing inferences to be drawn from this fact, summary judgment should not be granted. See, *e.g. Vaughan v. Town of Lyman*, 370 S.C. 436, 448, 635 S.E.2d 631, 638 (2006) (holding summary judgment was improper when the evidence was susceptible of more than one reasonable inference).

*Williams v. Jeffcoat*, \_\_\_ S.C. \_\_\_, \_\_\_ S.E.2d \_\_\_ (Op. No. 28236)

This supplemental citation should be inserted at page 17 of the Appellant’s August 9, 2023, Final Brief, following the citation to *Wade v. Berkeley County* as additional supporting evidence of the Master-in-Equity’s failure to apply the correct summary judgment standard to this case. (The Master-in-Equity’s standard of review here is found on pages 5 and 6 of the Record on Appeal and says that a plaintiff cannot rest on mere allegations and has a heightened pleading standard in defamation cases.) With kind regards I am

Very truly yours,

  
Belk, Cobb, Infinger & Goldstein, P.A.  
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