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**Oct 23 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
James C. Campbell, Sumter County Clerk of Court

Circuit Court Case No.: 2024-CP-43-00703  
Appellate Case No. 2024-001073

Christol Morton,.....Respondents,

v.

Carolina Cutting Coring, LLC and Sean Michael Shaffer, Jr.,.....Appellants.

**PROOF OF SERVICE**

I certify that I have served a copy of the Initial Brief of Respondent and the Designation of Additional Matter on all counsel, by emailing a copy of the same on October 23, 2024, by address as follows:

Charles Stuart Gwynne, Jr.  
Turner Padgett Graham & Laney, PA  
1901 Main Street  
Columbia, SC 29201  
cgwynne@turnerpadgett.com



Meredith Brown  
Legal Assistant  
Bluestein Thompson Sullivan, LLC  
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October 23, 2024

cc: John S. Nichols, Esq. (john@bluesteinattorneys.com)  
Brendan J. Green, Esq. (brendan@richardsonthomas.com)  
Shaquana M. Cuttino, Esq. (thecuttinolawfirm@gmail.com)

## Meredith Brown

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**From:** Meredith Brown  
**Sent:** Wednesday, October 23, 2024 3:30 PM  
**To:** Gwynne, Charles S  
**Cc:** John Nichols; Brendan Green; thecuttinolawfirm@gmail.com  
**Subject:** Morton v. Carolina Cutting Coring- Case No.: 2024-001073  
**Attachments:** 2024.10.23- Initial Brief of Respondent.pdf; 2024.10.23- Respondents DOM.pdf

Dear Counsel,

Please find enclosed the Initial Brief of Respondent along with the Designation of Matter, in the above referenced matter.

Thank you,  
Meredith



**MEREDITH BROWN OFFICE MANAGER &  
LEGAL ASSISTANT TO JOHN S. NICHOLS**

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October 23, 2024

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The Hon. Jenny A. Kitchings  
Clerk of the Court of Appeals  
Court of Appeals of South Carolina  
1220 Senate Street  
Columbia, SC 29201

RE: Christol Morton v. Carolina Cutting Coring, LLC and Sean Michael Shaffer, Jr.  
Appellate Case No.: 2024-001073

Dear Ms. Kitchings:

I have enclosed for filing the Initial Brief of Respondent with the Designation of Additional Matter and Proof of Service, to the Appellant's regarding the above matter. A bound copy of this filing will be delivered to the South Carolina Court of Appeals, once it is completed at Columbia Printing & Graphics.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions or need any additional information.

With kind regards,

/s/ John S. Nichols

John S. Nichols

SC Bar# 4210

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