

**From:** [Carroll, Todd](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Yingling, Donna](#); [Hall, Kevin](#); [O'Neill, Elizabeth](#); [Steve Pugh](#); [Ben Carlton](#); [Ashwin Sanzgiri](#); [vrawl@grsm.com](#); [John Nichols](#); [jelliott@richardsonplowden.com](#); [cganjehsani@richardsonplowden.com](#); [cberthelsen@richardsonplowden.com](#); [John T. Lay](#); [Gray Culbreath](#); [ljoyner@gwblawfirm.com](#); [ejones@gwblawfirm.com](#); [Jon Robinson](#); [Jon Robinson](#); [Shanon Peake](#); [shanonp@smithrobinsonlaw.com](#); [murrell@smithrobinsonlaw.com](#); [Brown, Troy S.](#); [dana.becker@morganlewis.com](#); [Jacques, Robert](#); [brady.edwards@morganlewis.com](#); [paul.scrudato@morganlewis.com](#); [Theile McVey](#); [jkassel@kassellaw.com](#); [jrutkoski@kassellaw.com](#); [tbranham@dobslegal.com](#); [kpaul@dobslegal.com](#); [David Humen](#); [sbrown@ycrlaw.com](#); [tgandy@ycrlaw.com](#); [sgriffith@ycrlaw.com](#)  
**Subject:** notice of appeal and accompanying motion in Circuit Court Case No. 2023-CP-40-1759  
**Date:** Friday, November 1, 2024 4:26:32 PM  
**Attachments:** [image207546.png](#)  
[image641330.png](#)  
[image164513.png](#)  
[image954724.png](#)  
[October 2, 2024 Order \(3540798\).pdf](#)  
[Motion to Consolidate with Appellate Case No. 2024-001446.pdf](#)  
[Notice of Appeal \(Oct. 2, 2024 Order\).pdf](#)

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Madam Clerk,

Please find attached for filing a notice of appeal of the circuit court's October 2, 2024 Order in the above-referenced action, along with a copy of the order at issue and a motion to consolidate this appeal with Appellate Case No. 2024-001446. We will submit the requisite filing fees for the notice and motion within five business days of this correspondence. By copy to opposing counsel, we are serving them with copies of the notice and motion via this email. We appreciate the Court's consideration of the attached, and have a great weekend,

Todd

**Todd Carroll**

Partner

Womble Bond Dickinson (US) LLP

**d:** 803-454-7730

**m:** 803-446-2883

**e:** [Todd.Carroll@wbd-us.com](mailto:Todd.Carroll@wbd-us.com)

1221 Main Street

Suite 1600

Columbia, SC 29201



[womblebonddickinson.com](http://womblebonddickinson.com)



This email is sent for and on behalf of Womble Bond Dickinson (US) LLP. Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see [www.womblebonddickinson.com/us/legal-notice](http://www.womblebonddickinson.com/us/legal-notice) for further details.