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**Mar 03 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Lancaster County  
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

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Case No. 2022-CP-29-00240  
Appellate Case No. 2023-001980

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Jenna Robbins,

Appellant,

v.

IMF13, LLC d/b/a The Indigo at Cross Creek, Taft Management Group, Taft Family Ventures, Southern-eez Landscaping, LLC, and Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping,

of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

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**MOTION FOR APPELLANT TO CORRECT CAPTIONS**

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*Attorneys for Respondent*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Respondent Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping, by and through its undersigned counsel, moves for Appellant Jenna Robbins to use the correct caption in her Final Brief, Final Reply Brief, and Record on Appeal pursuant to Rules 240 and 260 of the South Carolina Appellate Court Rules.

On December 29, 2023, this Court issued a letter to the parties advising that the title of this matter had been changed and that “[a]ll future records in this matter should be changed to reflect this title.” Nevertheless, Appellant has not used the title that this Court provided in her briefs. We bring this to the Court’s attention after asking Appellant to correct the error because Appellant uses her own caption in an inappropriate attempt to bolster her argument.

Corporate identity is the key issue in this case, and Appellant has incorrectly stated that Southern Horticulture Group, LLC is also known as Sothern-EEZ Landscaping, LLC in her captions. Not only is this factually incorrect as detailed in Respondent’s Brief, it is also a willful disobedience to this Court’s instruction on the correct title in this matter. Respondent respectfully requests this Court to order Appellant to correct her captions to conform to this Court’s instruction. This relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

The undersigned counsel consulted with counsel for Appellant, who failed to respond to this request.

Respectfully submitted,

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Charleston, South Carolina

March 3, 2025

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of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

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**PROOF OF SERVICE**

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*Attorneys for Respondent*

I, Catherine H. Chase, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that Respondent's **MOTION FOR APPELLANT TO CORRECT CAPTIONS** was served on all other parties to this appeal on March 3, 2025, via email (see attached) to their following counsel of record:

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Respectfully submitted,  
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Dated: March 3, 2025

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**Subject:** Robbins v. IMF13, LLC; Appellate Case No. 2023-001980 (CR 230494)  
**Date:** Monday, March 3, 2025 3:20:56 PM  
**Attachments:** [Motion to Correct Caption.pdf](#)  
[image001.png](#)

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Enclosed please find Respondent's Motion for Appellant to Correct Captions for service upon you in the above-referenced matter.

Thank you,

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