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February 28, 2025

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court<sup>[L]</sup><sub>[SEP]</sub> South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RE: Santiago v. Avila et al**  
**Appellate Case No. 2024-001239**

Dear Ms. Kitchings:

In so much as the Appellant's Notice of his intention to amend the Designation of Matter is a proper filing and accepted by the Court, please note, in response, that **the Respondents do not consent to any amendment of the Designation of Matter**. Appellant has made no effort to contact or discuss amendment of the Designation of Matter with the undersigned—in writing or otherwise. Furthermore, Appellant's Notice of his intention to amend the Designation of Matter does not state, with any specificity, how or why he intends to amend the Designation of Matter.

The parties have already submitted their initial briefs and reply brief. It is the Respondents' position that the time for filing the Designation of Matter has passed and the Designation of Matter cannot be amended without consent of all parties and/or without a showing of good cause as to why amendment is necessary. The Respondents respectfully object to amendment of the Designation of Matter.

Thank you for your time and consideration to this matter.

Sincerely,

*GARCIA LAW LLC*



Stephen N. Garcia  
Attorney for Respondents

CC: Lad Santiago (*via email only*)