

THE STATE OF SOUTH CAROLINA
In The Supreme Court

Appellate Case No. 2025-000272

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Opinion No. 2024-UP-414 (S.C. Ct. App. Filed Dec. 11, 2024)

Mark Shaffer, as Personal Representative of the Estate of Susan Shaffer,Respondent,

v.

DEH Disaster Recovery, LLC; Ceres Environmental Services, Inc.; Beaufort County, A Political Subdivision of the State of South Carolina; Ryan Colter Stoltz; Matt T. Dotson; Tim Tod Dotson; Brandi Dotson; Spencer A. Olson Trucking, LLC; Buyers Products, Co.; and TruckPro, LLC,..... Defendants,

of which

Ceres Environmental Services, Inc. and Beaufort County, a Political Subdivision of the State of South Carolina, are the Petitioners.

CERTIFICATE OF SERVICE

The undersigned certifies that on March 7, 2025, the Petitioners’ Reply Brief for Writ of Certiorari by Ceres and Beaufort County and this Certificate of Service were electronically filed with the South Carolina Supreme Court and the South Carolina Court of Appeals, as well as served upon all counsel of record in this matter, by email addressed to the following:

<p>The Honorable Patricia A. Howard Clerk of Court South Carolina Supreme Court Post Office Box 11330 Columbia, South Carolina 29211 supctfilings@sccourts.org</p>	<p>The Honorable Jenny Abbott Kitchings Clerk of Court South Carolina Court of Appeals Post Office Box 11629 Columbia, South Carolina 29211 ctappfilings@sccourts.org</p>
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<p>Julius W. Gernes, Esquire Steven D. Pattee, Esquire Donna Law Firm, P.C. 7601 France Avenue South, Ste. 350 Minneapolis, MN 55435 spattee@donnalaw.com; jgernes@donnalaw.com Attorneys for Spencer A. Olson Trucking, LLC</p>	<p>E. Mitchell Griffith, Esquire Griffith, Freeman & Liipfert, LLC 600 Monson Street Beaufort, SC 29901 mgriffith@griffithfreeman.com Attorney For Respondent Spencer A. Olson Trucking, LLC</p>
<p>Gray T. Culbreath, Esquire Makenzie E. Polston, Esquire Gallivan, White & Boyd Post Office Box 7368 Columbia, South Carolina 29202 gculbreath@gwblawfirm.com mpolston@gwblawfirm.com Attorneys for Tetra Tech, Inc.</p>	<p>Glynn L. Capell, Esquire Charles W. Thomson, Esquire The Capell Law Firm, LLC PO Box 1559 Bluffton, SC 29910 gcapell@capellthomson.com cthomson@capellthomson.com Attorneys for Matt T. Dotson, Tim Tod Dotson, and Brandi Dotson</p>
<p>Marc J. Meister, Esquire Marc J. Meister, LLC PO Box 22585 Hilton Head, SC 29925 marc@meisterlegal.com Attorney for Matt T. Dotson, Tim Tod Dotson, and Brandi Dotson</p>	<p>Russell M. Racine, Esquire Cranfill Sumner & Hartzog, LLP 2907 Providence Rd., Ste. 200 Charlotte, NC 28211 rracine@cshlaw.com Attorneys for Buyers Products Company and TruckPro, LLC</p>



March 7, 2025
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COPY OF PETITIONERS' COUNSEL'S EMAIL TO ALL COUNSEL OF RECORD DATED MARCH 7, 2025
SERVING THE REPLY BRIEF FOR WRIT OF CERTIORARI IN APPELLATE CASE NO. 2025-000272

Respectfully submitted,

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March 7, 2025

From: Patrick Flynn

Sent: Friday, March 7, 2025 10:09 PM

To: stacey.monaco@mgclaw.com; sue@fkuhnlawfirm.com; kdean@griffithfreeman.com; lsmyth@griffithfreeman.com; spattee@donnalaw.com; gwhite@griffithfreeman.com; shawn.bevans@mgclaw.com; fred@fkuhnlawfirm.com; mgriffith@griffithfreeman.com; Falin, Stormy <sfalin@sccourts.org>; Marc Meister <marc@meisterlegal.com>; Glynn Capell <gcapell@capellthomson.com>; Charles Thomson <cthomson@capellthomson.com>

Subject: Appellate Case No. 2025-000272; Estate of Susan Shaffer v. Ceres Env. and Beaufort County, et al.; Petitioners' Reply Brief for Writ of Certiorari - for Service on March 7, 2025

Good evening counsel:

I have attached for service upon each of you a copy of the Petitioners' Reply Brief for Writ of Certiorari in the above-referenced matter by Ceres Environmental Services and Beaufort County, along with a copy of the Certificate of Service of the Reply.

If you have any questions, please let me know. Best regards ----Pat Flynn

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