

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas

**Mar 10 2025**

**SC Court of Appeals**

Brian M. Gibbons, Circuit Judge

Appellate Case No. 2023-001980

Jenna Robbins,.....Appellant,

v.

Imfi3, LLC, D/B/A The Indigo At Cross Creek, Taft Management Group, Taft Family Ventures, and Southern-EEZ Landscaping, LLC, and Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping,

Of whom Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping is the.....Respondent.

RETURN TO MOTION FOR APPELLANT TO CORRECT CAPTIONS

Appellant hereby submits this response to the Respondent’s motion for the Appellant to correct captions:

1. Appellant acknowledges that the captions on her earlier findings were differently phrased than that in the court’s initial letter. The Appellant forgot to change the caption and just kept using the one on her notice of appeal.
2. This was not some argument or persuasion strategy, and the Respondent offers no support for the contention that it was. The

accusations Respondent makes in its motion are both unfounded and unnecessary to support the motion.

3. Appellant will be changing the caption on the record on appeal and on her final briefs to conform to the court's initial letter.
4. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

Respectfully submitted,

/s/ Andrew S. Radeker  
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March 10, 2025