

**From:** [Hannah Secka](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Kim Chatman](#); [Meredith Seibert](#); [Dave Duff](#); [shellynationalrjn@gmail.com](#); [James Johnson](#); [Elder James Williams](#)  
[LifeLine PLUS Advocate](#)  
**Subject:** Secka v. Florence SD 1, et, al., Appellate Case No.: 2024-001154 - Re: Filing RIB, DOM & COS  
**Date:** Tuesday, August 19, 2025 10:02:46 AM  
**Attachments:** [Secka v. Florence - RIB.pdf](#)  
[Secka v. Florence - DOM.pdf](#)

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

Dear South Carolina Court of Appeals,

In South Carolina, appealing issues that were not preserved (i.e., objected to at trial) is challenging and typically only reviewed under the "*plain error*" or "*manifest injustice*" doctrines, which are applied sparingly to address serious errors that fundamentally impact fairness or due process. Such an **OBJECTION** was placed on 8/21/2024 with Judge Michael Nettles by Hannah Secka. Hence, I will send a final brief within 30 day timeline in response se to Defendants 8/18/2025 brief, due to the significant errors during the summary judgment hearing, such as the exclusion of crucial evidence, lawyer misconduct by David Lyon, David Duff, legal malpractice, and ineffective counsel of Attorney Darryl C. Caldwell, Esq.

Hannah L. Secka

Sent from my iPhone

On Aug 19, 2025, at 8:43 AM, Court Of Appeals Filings  
<ctappfilings@sccourts.org> wrote:

**RECEIVED**  
**Aug 19 2025**  
**SC Court of Appeals**

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Kim Chatman <kchatman@dfs-lawfirm.com>  
**Sent:** Monday, August 18, 2025 11:39 PM  
**To:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Hannah Secka <hannsc2@aol.com>; Meredith Seibert <mseibert@dfs-lawfirm.com>; Dave Duff <dduff@dfs-lawfirm.com>  
**Subject:** Secka(2) v. Florence SD 1, et, al., Appellate Case No.: 2024-001154 - Re: Filing RIB, DOM & COS

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Dear Honorable Clerk of Court, the attached documents are being transmitted on behalf of attorney Seibert for filing purposes. As evidenced by the attached Certificates of Service the Appellant is being served electronically and by mail.

Please contact our office should you require additional documentation/information.

Thank you and we look forward to hearing from you.

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