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Aug 19 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Jessica A. Salvini  
Circuit Court Judge

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Appellate Case No. 2024-002063

Jon Kane,

Appellant,

v.

Darien Applegate; Darien E. Applegate Trust;  
Darien E. Applegate, Successor in Partnership;  
Big Blue Allure, LLC; Allure Outdoor, LLC;  
Allure Advertising, LLC; Lamar OCI South Corp.;  
and Lamar Advertising, Defendants

Of which Darien Applegate, individually, and as Trustee of the Darien E. Applegate Trust, and as Successor in Partnership; Big Blue Allure, LLC; and Allure Outdoor, LLC; are the Respondents.

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**PROOF OF SERVICE**

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I, the undersigned, certify that I have served the *Final Brief of Appellant* and the *Final Reply Brief of Appellant* and printable versions of *the Record on Appeal* on this 19th day of August 2025 on counsel for Respondents at her AIS-designated email addresses as set forth below:

Jennifer M. Houti, Esq.,  
JAMES, McELROY & DIEHL, P.A.  
jhouti@jmdlaw.com

A copy of this correspondence is attached.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esq. (SC Bar No. 101906)

751 Johnnie Dodds Blvd., Suite 200

Mt. Pleasant, South Carolina 29464

jesse@jessesanchezlaw.com

(843) 814-8181

**Attorney for Appellant**

August 19, 2025

Mount Pleasant, South Carolina

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## Jon Kane v. Darien Applegate, et al. - Appellate Case No. 2024-002063

1 message

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**Jesse Sanchez** <jesse@jessesanchezlaw.com>

Tue, Aug 19, 2025 at 9:07 AM

To: "Houti, Jennifer" <jhouti@jmdlaw.com>

Cc: Dan <dan@slotchiverlaw.com>, Matthew Kelly <mkelly@oysterrd.com>, Kali Bravo <paralegal@slotchiverlaw.com>

Dear Counsel,

Please find attached for service the following documents, which are being filed today with the South Carolina Court of Appeals via OneDrive electronic submission:

- Final Brief of Appellant
- Final Reply Brief of Appellant
- Cover Letter

I am also including a printable two-volume version of the [Record on Appeal](#) for your records. This version is identical in content to the previously served Record, but has been reformatted into two volumes to comply with the Court's physical filing requirements.

Best regards,

Jesse

--

Jesse Sanchez  
The Law Office of Jesse Sanchez, LLC  
751 Johnnie Dodds Blvd., Suite 200  
Mount Pleasant, SC 29464  
Direct: (843) 814-8181  
Fax: (843) 284-3953  
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Kane - Record on Appeal Volume 1.pdf

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### 4 attachments



**Kane - Final Brief of Appellant.pdf**

192K



**Kane - Final Reply Brief of Appellant.pdf**

149K



**Kane - Cover Letter to Kitchings 20250819.pdf**

110K



**Kane - Record on Appeal Volume 2.pdf**

1179K

August 19, 2025



VIA UNITED STATES FIRST CLASS MAIL  
AND ONEDRIVE ELECTRONIC SUBMISSION

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Jon Kane, Appellant v. Darien Applegate, et al., Respondents  
Appellate Case No. 2024-002063

Dear Ms. Kitchings:

Attached for filing, please find the following:

1. The *Final Brief of Appellant*,
2. The *Final Reply Brief of Appellant*,
3. A printable version of the *Record on Appeal* in two volumes, and
4. *Proof of Service* evidencing service of the above items on counsel for Respondents.

In addition, hard bound copies of each of the above briefs and the Record on Appeal with corresponding color covers are being mailed to your office today.

Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)

Attachments (as stated)

Cc: Jennifer M. Houti, Esq.  
Daniel S. Slotchiver, Esq.  
Matthew Z. Kelly, Esq.