

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
)
Joseph and Lauren Jaco ,)
 Respondents)
)
v.)
)
)
J.N. Green and Associates LLC; Big Blue)
 Express LLC; and Joe N. Green,)
 Appellants ,)
)
)
_____)

IN THE COURT OF APPEALS

Appellate Case No.: 2024-000679
Trial Court Case No.: 2022-CP-28-00877

**MOTION TO COMPEL
DOCUMENT PRODUCTION**



The Appellants, J.N. Green and Associates, LLC; Big Blue Express, LLC; and Joe N. Green, by and through counsel, respectfully moved this Honorable Court to direct the Respondents, Joseph and Lauren Jaco, through their counsel of record, to produce specific documents and communications relevant to the issues in this appeal for inclusion in the Record on Appeal.

On information and belief, there exist emails, correspondence, or related communications between Respondents' counsel and the appointed Special Referee in this matter that were not contemporaneously shared with Appellants or Appellants' counsel. By way of example, the Special Referee in this case was appointed prior to the appearance of Appellants' counsel in the lower court proceedings, and on information and belief, certain communications occurred regarding that appointment and possibly other substantive matters prior to Appellants' participation in the case. These communications are directly relevant to the proceedings and may bear upon procedural and substantive aspects of the case now on appeal.

Although Appellants previously made a Motion for Production seeking this information, the request was denied for lack of specificity. Appellants now move the Court with greater specificity based on the context outlined above.

These materials are essential to ensure a complete, accurate, and transparent appellate record, and to allow for meaningful review by this Court. Accordingly, the Appellants

respectfully request that the Court direct the Respondents to produce the following within ten (10) days of the Court's Order:

1. Any and all emails, letters, text messages, or other correspondence between Respondents' counsel and the appointed Special Referee in this matter, particularly any that were not contemporaneously provided to Appellants or Appellants' counsel;
2. Any and all emails, letters, text messages, or other correspondence between Respondents' counsel and any third parties referencing or concerning the appointment, role, or communications of the Special Referee; and
3. Any and all documents, notes, or communications that reference, relate to, or concern the Special Referee's communications, determinations, or involvement in this case.

Appellants further request that, If any such documents or communications do not exist, the Respondents shall be directed to provide a verified written statement under oath affirming that no such materials exist and that a diligent search has been made to confirm their absence.

This motion is not made for the purpose of delay. However, in the interest of fairness and to preserve the integrity of the Record on Appeal, Appellants respectfully request that all applicable deadlines be held in abeyance pending the Court's ruling on this motion.

WHEREFORE, the Appellants respectfully request that this Court:

1. Direct the Respondents to produce the above-requested documents and communications within ten (10) days of the Court's Order; or in the alternative,
2. Require the Respondents to submit a verified written statement under oath confirming that no such materials exist after a diligent search;
3. Direct that all produced materials be incorporated for inclusion in the Record on Appeal;
4. Hold all applicable deadlines in abeyance pending resolution of this Motion; and
5. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted this 13th day of October, 2025.

TURNER LAW LLC

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