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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Joe M. Crosby, Master-In-Equity Judge

Case No. 2023-CP-22-00531
Ct. App. No. 2025-000850

W.C. Jennings Company, Inc., Plaintiff,

v.

Joseph Failla, Renee Failla and Anderson Brothers Bank, Defendants,

AND

Anderson Brothers Bank, CounterClaim/Cross-Claim Plaintiff,

v.

W.C. Jennings Company, Inc., Counterclaim Defendant,

Joseph Failla and Renee Failla a/k/a Renee F. Failla, Cross-Claim Defendants,

of which W.C. Jennings Company, Inc., and Anderson Brothers Bank are the Respondents, and Joseph Failla and Renee Failla are the Appellants.

INITIAL BRIEF OF RESPONDENT ANDERSON BROTHERS BANK

s/ Suzanne Taylor Graham Grigg _____
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TABLE OF AUTHORITIES

Respondent Anderson Brothers Bank (“ABB”) adopts by reference the Table of Authorities set forth in Respondent W.C. Jennings Company, Inc.’s (“W.C. Jennings”) Initial Brief. (W.C. Jennings Initial Br. at ii.)

ISSUE PRESENTED

ABB adopts by reference the Issue Presented set forth in Respondent W.C. Jennings' Initial Brief. (W.C. Jennings Initial Br. at 1.)

STATEMENT OF THE CASE

ABB adopts by reference the Statement of the Case set forth in Respondent W.C. Jennings' Initial Brief. (W.C. Jennings Initial Br. at 1-3.)

STANDARD OF REVIEW

ABB adopts by reference the Standard of Review set forth in Respondent W.C. Jennings' Initial Brief. (W.C. Jennings Initial Br. at 3.)

ARGUMENTS AND AUTHORITIES

ABB adopts by reference the Arguments and Authorities set forth in Respondent W.C. Jennings' Initial Brief. (W.C. Jennings Initial Br. at 3-6.)

CONCLUSION

ABB adopts by reference the Conclusion set forth in Respondent W.C. Jennings' Initial Brief. (W.C. Jennings Initial Br. at 6.)

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