

RECEIVED

Oct 31 2025

SC Court of Appeals

From: [Steven Edward Buckingham](#)
To: [Justin Lucey](#)
Cc: [Anna McCann](#); [Court Of Appeals Filings](#); charley@cak-law.com; [Kristina Shernoff](#)
Subject: Re: Ferraro v. LL of SC // 2024-001510 // Respondents" Reply in Support of MTS and Ret. in Opp. to Apps." Motions
Date: Friday, October 31, 2025 4:34:26 PM

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

Respondents agree.
Sent from my iPhone

On Oct 31, 2025, at 4:23 PM, Justin Lucey <jlucey@lucey-law.com> wrote:

RE: Ferraro et al vs. LL of SC, LLC et al
Appellate Case Number 2024-001510

Dear Court of Appeals/Catherine Harrison,

Due to the short time between now and the weekend and next weeks' Nov. 5 argument in your Court, I am taking the liberty of communicating with you by email.

Appellants and Respondents have resolved their settlement differences by written document. This matter is now settled, subject to Rule 23, SCRCP, Court approval.

Procedurally, Plaintiffs consent to Appellants' Motion for a Continuance.

In response to Appellants Motion to Enforce, Respondents consent to a stay or remand for the Circuit Court to consider and enroll the settlement. Plaintiffs continue to object to any other relief requested in that Motion. If the Court of Appeals ("COA") prefers, it can dismiss that Motion as Moot on Monday after Plaintiffs file their Motion to Enroll Rule 23 (derivative action) settlement in the Circuit Court.

Further, Respondent is happy to consider the COA's instructions on the appropriate disposition of current matters.

By copy of this email, I am asking Appellants' counsel to confirm the resolution of the settlement dispute.

Respectfully submitted,

Justin Lucey

Justin O'Toole Lucey, P.A.
415 Mill Street
Mount Pleasant, SC 29464
Office: 843.849.8400
Direct: 843.849.8406
www.lucey-law.com

From: Anna McCann <amccann@lucey-law.com>
Sent: Friday, October 31, 2025 10:48 AM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Steven Edward Buckingham <seb@buckingham.legal>; charley@cak-law.com; Kristina Shernoff <kshernoff@lucey-law.com>
Subject: RE: Ferraro v. LL of SC // 2024-001510 // Respondents' Reply in Support of MTS and Ret. in Opp. to Apps.' Motions

Good morning:

Please find two (2) documents attached to this email for filing: (1) Respondents' Reply in Support of their Motion to Strike and Return in Opposition to Appellants' Motions to Continue and to Compel; and (2) Respondents' Proof of Service for the same.

All counsel of record are copied on this correspondence.

If you have any questions, please feel free to contact our office at the number below.

Anna S. McCann, Esq.
Justin O'Toole Lucey, P.A.

415 Mill Street
Mount Pleasant, SC 29464
Office: 843.849.8400
Direct Line: 843.375.0792
Fax: 843.849.8406
www.lucey-law.com

From: Kristina Shernoff <kshernoff@lucey-law.com>
Sent: Monday, October 27, 2025 3:51 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Anna McCann <amccann@lucey-law.com>;
Steven Edward Buckingham <seb@buckingham.legal>; charley@cak-law.com; Kristina
Shernoff <kshernoff@lucey-law.com>
Subject: Ferraro v. LL of SC // 2024-001510 // Respondents' Motion to Strike

Good afternoon:

Please find two (2) documents attached to this email for filing: (1) Respondents' Motion to Strike; and (2) Respondents' Proof of Service for the same.

All counsel of record are copied on this correspondence, and the filing fee is being submitted separately via U.S. Mail.

If you have any questions, please feel free to contact our office at the number below.

Thank you,

Kristina

Kristina Koklas Shernoff

Senior Paralegal

Justin O'Toole Lucey, P.A.

<i>phone</i>	843.849.8400
<i>direct</i>	843.849.6449
<i>email</i>	kshernoff@lucey-law.com
<i>website</i>	www.lucey-law.com

| *address*

| 415 Mill St., Mt. Pleasant, SC 29464