

November 11, 2025

Via Email / Electronic Filing

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED
Nov 12 2025
SC Court of Appeals

RE: *Curtis D. Bale v. John A. Dougherty, Wachovia Securities Financial Holdings, LLC, Wells Fargo Clearing Services, LLC, f/k/a Wells Fargo Advisors, LLC, Wells Fargo & Company, Wells Fargo Bank, N.A., and LPL Financial, LLC*
SC Appellate Case No.: 2025-002124

Dear Ms. Kitchings:

We write on behalf of Respondent LPL Financial LLC (“LPL”) regarding the “Motion to Reinstate the Appeal” filed by Appellant in appeal 2025-002124. This appeal was dismissed by order of the Court of Appeals, signed on October 22, 2025, by Judge Jerry D. Vinson, Jr., and remittitur was ordered on November 6, 2025. While Appellant has styled his motion as a “Motion to Reinstate,” a motion to reinstate under Rule 260(a), SCACR is not proper here as this matter was dismissed by an order of the Court—not by the clerk—as the first footnote of Appellant’s Motion to Reinstate concedes. To the extent that the Court is inclined to treat the motion as a petition for rehearing under Rule 219(b), SCACR, Appellant has exceeded the page limits under that rule, and Respondents are not permitted to respond thereto absent Court order under Rule 221(a), SCACR. LPL therefore writes to request the Court’s guidance as to whether a response is needed, and if so, by what deadline such response should be submitted.

Thank you for your kind attention to this matter.

Respectfully submitted,



Adam J. Hegler

AH:lab

cc: All Counsel of Record (via electronic mail)

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Nov 12 2025

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Judge Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2025-002124

Curtis D. Bale,.....

Appellant,

v.

John A. Dougherty, Wachovia Securities Financial Holdings, LLC,
Wells Fargo Clearing Services, LLC, f/k/a Wells Fargo Advisors,
LLC, Wells Fargo & Company, Wells Fargo Bank, N.A., and LPL
Financial, LLC,

Defendants,

of which John A. Dougherty, Wells Fargo Clearing Services, LLC,
f/k/a Wells Fargo Advisors, LLC, Wells Fargo Bank, N.A., and
LPL Financial, LLC are,

Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2025, in compliance with Rule 262(c),
SCACR, I served the attached letter of the same date by electronic mail on the counsel below at
their email address on file with the Attorney Information System. I further certify that all parties
required to have been served have been served.

WILLOUGHBY HUMPHREY &
D'ANTONI, P.A.
R. Walker Humphrey, II, Esquire
Mitchell Willoughby, Esquire
Margaret McCravey O'Shields
Elizabeth Zeck, Esquire
whumphrey@willoughbyhoefer.com
mwilloughby@willoughbyhoefer.com
moshields@whdlawyers.com

BURR FORMAN LLP
Paul D. Harrill
Victor Hayslip, Esquire
Ben Coulter, Esquire
pharill@burr.com
vhayslip@burr.com
bcoulter@burr.com
STONEY & WALKER LLC

ezeck@willoughbyhoefer.com

Counsel for Curtis D. Bale

Overture E. Walker, Esquire
owalker@stoneywalkerlaw.com

Counsel for John A. Dougherty, Wachovia Securities Financial Holdings, LLC, Wells Fargo Clearing Services, LLC, f/k/a Wells Fargo Advisors, LLC, Wells Fargo & Company, and Wells Fargo Bank, N.A

/s/Adam J. Hegler

Adam J. Hegler

November 11, 2025

From: Ann Boney
Sent: Tuesday, November 11, 2025 3:23 PM
To: Walker Humphrey; Mitchell Willoughby; 'moshields@whdlawyers.com'; Elizabeth Zeck; 'owalker@stoneywalkerlaw.com'; 'pharrill@burr.com'; 'vhayslip@burr.com'; 'bcoulter@burr.com'; 'kdavis@whdlawyers.com'
Cc: Adam Hegler; Cory Manning; Axton Crolley
Subject: Curtis D. Bale v. John A. Dougherty, et al. - Appellate Case No.: 2025-002124
Attachments: 2025.11.11 Hegler ltr to COA re Appellant Bale's Motion to Reinstate the Appeal.pdf; 2025.11.11 Court of Appeals Certificate of Service.pdf

Counsel – Served upon you as counsel for Appellant Curtis D. Bale in the above matter, please find attached Attorney Adam Hegler’s letter, which is also being emailed to the South Carolina Court of Appeals for filing today.

Respectfully,
Ann Boney
Paralegal

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SC Court of Appeals



ANN BONEY **PARALEGAL**
ann.boney@nelsonmullins.com
MERIDIAN | 17TH FLOOR
1320 MAIN STREET | COLUMBIA, SC 29201
T 803.255.5502 F 803.256.7500
NELSONMULLINS.COM **VCARD**
