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November 14, 2025

VIA 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 14 2025
SC Court of Appeals

Re: Curtis Bale v. John A. Dougherty, et al.
Appellate Case No. 2025-002124

Dear Ms. Kitchings:

I write as counsel on behalf of Respondents 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. (“Wells Fargo”) regarding the Motion to Reinstate the Appeal (“Motion”) filed by Appellant in the above-referenced appeal - 2025-002124. Wells Fargo joins Respondent LPL Financial, LLC (“LPL”) in its letter to the Court of Appeals dated November 11, 2025 requesting the Court deny the Motion as improper or, if the Court considers the Motion to be a petition for rehearing under Rule 219(b), SCACR, requesting the Court provide Wells Fargo guidance as to whether a return from Wells Fargo is requested by the Court pursuant to Rule 221(a), SCACR.

As set forth in the letter from LPL’s counsel, this appeal was dismissed by order of the Court of Appeals, signed on October 22, 2025, by Judge Vinson “because the underlying order [compelling the case to arbitration] is not immediately appealable . . .” Appellant’s attempt to “reinstate” the appeal under Rule 260(a) SCACR is not proper as admitted in the first footnote of their Motion. If the Court disagrees and requires or desires a return under Rule 240(e), SCACR, then Wells Fargo respectfully requests a ten (10) day extension to file any such return after receiving such notice from the Court. To the extent that the Court considers the Motion to be a petition for rehearing under Rule 219(b), SCACR, Wells Fargo is not permitted to file a return thereto absent Court order under Rule 221(a), SCACR. Wells Fargo, therefore, requests the Court’s guidance as to whether any response to Appellant’s Motion is needed and should be submitted by Wells Fargo.

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Thank you for your assistance in this matter.

Sincerely,

Burr & Forman LLP



Paul D. Harrill

PDH:vh

cc: Counsel of Record (via email)