

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

William H. Seals Jr., Circuit Court Judge

Opinion No. 2025-UP-244 (S.C. Ct. App. filed July 16, 2025)  
Appellate Case No. 2025-002148

Target Motors, LLC d/b/a Port City Motors,

Petitioner,

v.

Grand Strand Nissan, Inc., and Grainger  
Companies, Inc. d/b/a Grainger Honda,

Defendants,

Of which Grand Strand Nissan, Inc., is the

Respondent.

Proof of Service

I certify that I served Appellant's Motion to Supplement the Record on Respondent Grand Strand Nissan, Inc. today by sending a copy of the same via email to its counsel of record, Sarah P. Spruill, at [sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com).

A copy of the email is attached.

December 1, 2025

s/ Brooks R. Fudenberg  
Brooks R. Fudenberg  
14 Ashe Street  
Charleston SC 29403  
843-696-8911  
Attorney for Appellant

**From:** [Brooks R. Fudenberg](#)  
**To:** [Caskey, Mary](#); [Spruill, Sarah](#)  
**Cc:** "[Steve Moskos](#)"  
**Subject:** RE: Target Motors v. Grand Strand  
**Date:** Monday, December 1, 2025 3:23:48 PM  
**Attachments:** [Mot. Supp. Record.pdf](#)  
[Ex. 1. MSJ.pdf](#)  
[Ex. 2. Email thread .pdf](#)

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Please find attached Petitioner's Motion to Supplement the Record, which I hereby serve upon your client.

Thanks,

Brooks R. Fudenberg  
Law Office of Brooks R. Fudenberg, LLC  
14 Ashe Street  
Charleston SC 29403  
843-696-8911  
910-401-1242 (eFax)

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL AND PRIVILEGED ATTORNEY-CLIENT OR ATTORNEY WORK PRODUCT INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT, PLEASE CONTACT THE SENDER AND THEN DESTROY THIS COMMUNICATION

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**From:** Caskey, Mary <[mcaskey@hsblawfirm.com](mailto:mcaskey@hsblawfirm.com)>  
**Sent:** Sunday, November 30, 2025 1:50 PM  
**To:** Brooks R. Fudenberg <[Brooks.R.Fudenberg@FudenbergLaw.com](mailto:Brooks.R.Fudenberg@FudenbergLaw.com)>; Spruill, Sarah <[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)>  
**Cc:** 'Steve Moskos' <[steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com)>  
**Subject:** RE: Target Motors v. Grand Strand

Brooks-Hope you had a great Thanksgiving.

We do not consent to the motion.

Thanks,  
Mary



**Mary M. Caskey** | Attorney

Certified Specialist in Bankruptcy and Debtor-Creditor Law

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**From:** Brooks R. Fudenberg <[Brooks.R.Fudenberg@FudenbergLaw.com](mailto:Brooks.R.Fudenberg@FudenbergLaw.com)>

**Sent:** Friday, November 28, 2025 5:50 PM

**To:** Caskey, Mary <[mcaskey@hsblawfirm.com](mailto:mcaskey@hsblawfirm.com)>; Spruill, Sarah <[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)>

**Cc:** 'Steve Moskos' <[steve@moskoslawfirm.com](mailto:steve@moskoslawfirm.com)>

**Subject:** Target Motors v. Grand Strand

Mary, Sarah,

I hope y'all are having a good Thanksgiving. I hate to interrupt your holiday, but our Reply is due Monday. We want to supplement the record, per Rule 212 SCACR, to include your client's MSJ against Grainger, and if you like, the withdrawal of that motion. The documents are attached.

Will you consent?

Brooks R. Fudenberg  
Law Office of Brooks R. Fudenberg, LLC  
14 Ashe Street  
Charleston SC 29403  
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910-401-1242 (eFax)

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