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S.C. SUPREME COURT

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM Horry County  
Court of Common Pleas

William H. Seals, Jr. Circuit Court Judge

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.

**RETURN IN OPPOSITION TO MOTION TO SUPPLEMENT THE RECORD**

Grand Strand Nissan, Inc. (“Grand Strand”) submits this brief return in opposition to the motion to supplement the record filed by the Petitioner Target Motors, LLC d/b/a Port City Motors (“Target Motors”). Target Motors seeks to add Grand Strand’s motion for summary judgment as to the cross claims asserted by its co-defendant Grainger Companies, Inc. d/b/a Grainger Honda (“Grainger”)<sup>1</sup>, and the later withdrawal of that motion.

This history is not a new wrinkle, and nothing in Grand Strand’s return to the petition for a writ of certiorari changes the relevance of the materials. The summary judgment motion was

<sup>1</sup> The motion was based on Grand Strand’s argument that any claims between Grand Strand and Grainger must be resolved through arbitration.

referenced in the reply brief filed by Target Motors in the court of appeals. (Amended Reply at 24). Under Rule 210, SCACR, Target Motors could have designated these items for inclusion in the record on appeal when filing its reply with the court of appeals, but it failed to do so. Grand Strand submits that it is too late to do so now. For this reason, the request should be denied.

Respectfully submitted,

s/ Sarah P. Spruill

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