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December 15, 2025

**Via E-Filing**

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
**Dec 15 2025**  
**SC Court of Appeals**

Re: Conflicts Letter  
*Plant v. IMI Fabi (Diana), LLC*  
Appellate Case No. 2024-001997

Dear Ms. Kitchings:

We write in response to the Court's inquiry about scheduling conflicts for the potential oral argument dates. I am presently scheduled for a two-week jury trial before Judge Addy in a complex case in Lexington County that is to begin on March 30, 2026. Additionally, I am scheduled to be in Colorado for a mandatory partners meeting on April 15 and 16, 2026.

As such, I respectfully request protection for the dates April 6–9 and April 15–16 that were identified in the Court's most recent correspondence. Additionally, as the Court prepares its roster for arguments, please be aware that I am also counsel of record in Appellate Case No. 2023-000140, which is also subject to being placed on a roster during this same term of court.

Best regards,

/s/ M. Todd Carroll

Cc: All Counsel of Record (via e-filing)