

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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Dec 15 2025

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 Reply in Support of 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.

A copy of the email is attached.

December 15, 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 15, 2025 10:01:28 PM
Attachments: [Reply in Support of Mot. Supp. Record.pdf](#)
[Motion Repl PoS.pdf](#)

Please find attached Reply in Support of 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

From: Caskey, Mary <mcaskey@hsblawfirm.com>
Sent: Sunday, November 30, 2025 1:50 PM
To: Brooks R. Fudenberg <Brooks.R.Fudenberg@FudenbergLaw.com>; Spruill, Sarah <sspruill@hsblawfirm.com>
Cc: 'Steve Moskos' <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

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From: Brooks R. Fudenberg <Brooks.R.Fudenberg@FudenbergLaw.com>

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

To: Caskey, Mary <mcaskey@hsblawfirm.com>; Spruill, Sarah <sspruill@hsblawfirm.com>

Cc: 'Steve Moskos' <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?

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