



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

CATHERINE S. HARRISON  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

January 30, 2026

Mr. Aaron Jameson Hayes, Esquire  
PO Box 12129  
Columbia SC 29211

Re: The Cincinnati Specialty Underwriters v. Zapp Scooters Inc.  
Appellate Case No. 2024-000136

Dear Counsel:

Upon reviewing your motion to withdraw Madison K. Kea as counsel for the appellant, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your filing will not be considered:

- A proof of service has not been provided showing service upon Respondents Frank Scozzafava and Zapp Scooters Inc. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

Handwritten signature of Jasmine D. Smith, Deputy Clerk, in blue ink.

CLERK

cc: Mark Steven Barrow, Esquire  
Andrew D. Gowdown, Esquire

Mary Harriet Moore, Esquire  
Madison Killen Kea, Esquire  
Zapp Scooters Inc. d/b/a Zapp Ride Share  
Frank Scozzafava