

**RECEIVED**

**Mar 12 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas  
Haigh Porter, Master-in-Equity

---

Appellate Case No.: 2025-001115  
Civil Action No.: 2024-CP-21-00548

---

Shirley Reed,..... Respondent,

vs.

OHM Florence, LLC,..... Appellant.

---

**PROOF OF SERVICE**

---

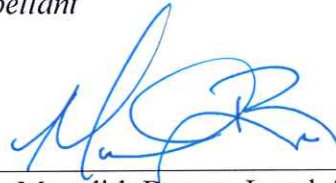
I certify that I have served the Respondent's Final Brief upon the Appellant OHM Florence, LLC, by electronic mail on March 11, 2026, addressed to their attorneys of record as follows:

Sweeny, Wingate & Barrow, P.A.  
Daniel Q. Atkinson  
Ryan C. Holt  
Brian L. Craven  
Madison K. Kea  
1515 Lady Street  
Post Office Box 12129  
Columbia, South Carolina 29211  
(803) 256-2233  
[rch@swblaw.com](mailto:rch@swblaw.com)  
[bic@swblaw.com](mailto:bic@swblaw.com)  
[mkk@swblaw.com](mailto:mkk@swblaw.com)  
[dqa@swblaw.com](mailto:dqa@swblaw.com)

Hood Law Firm, LLC  
Robert H. Hood, Jr.  
Post Office Box 1508  
Charleston, South Carolina 29402-1508  
(843) 577-4435  
[bobbyjr.hood@hoodlaw.com](mailto:bobbyjr.hood@hoodlaw.com)

Aiken Bridges Elliott Tyler & Saleeby, P.A.  
J. David Banner  
Post Office Drawer 1931  
Florence, South Carolina 29503  
(843) 669-8787  
[jdb@aikenbridges.com](mailto:jdb@aikenbridges.com)

*Attorneys for Appellant*



---

Meredith Brown, Legal Assistant to  
John S. Nichols, Esq.  
[meredith@bluesteinattorneys.com](mailto:meredith@bluesteinattorneys.com)

*Attorneys for Respondent:*

Bluestein Thompson Sullivan, LLC  
John S. Nichols, Esq.  
J. Clarke Newton, Esq.  
Post Office Box 7965  
Columbia, South Carolina 29202  
(803) 799-7599  
[John@bluesteinattorneys.com](mailto:John@bluesteinattorneys.com)  
[Clarke@bluesteinattorneys.com](mailto:Clarke@bluesteinattorneys.com)

Jernigan Law Firm  
Rodney C. Jernigan, Jr., Esq.  
Post Office Box 2130  
Florence, South Carolina 29503-2130  
(843) 664-0540  
[Rod@jerniganlaw.net](mailto:Rod@jerniganlaw.net)

March 12, 2026

Mar 12 2026

Meredith Brown

SC Court of Appeals

**From:** Meredith Brown  
**Sent:** Thursday, March 12, 2026 9:26 AM  
**To:** jdb@aikenbridges.com; Bobby; Ryan C. Holt; Brian L. Craven; mkk@swblaw.com; Daniel Q. Atkinson  
**Cc:** John Nichols; Clarke Newton; Rod Jernigan; Kalen Reed  
**Subject:** Case No: 2025-001115 Shirley Reed v OHM Florence, LLC  
**Attachments:** 2026.03.12- Final Brief.pdf

Dear Counsel,

Please find enclosed for filing the Respondent’s Final Brief, in the above referenced matter.

Thank you,  
Meredith

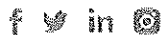


**MEREDITH BROWN OFFICE MANAGER &  
 LEGAL ASSISTANT TO JOHN S. NICHOLS**

1614 TAYLOR STREET | PO BOX 7965  
 COLUMBIA, SOUTH CAROLINA 29202  
 O: 803.779.7599 F: 803.771.8097

[MEREDITH@BLUESTEINATTORNEYS.COM](mailto:MEREDITH@BLUESTEINATTORNEYS.COM)

[BLUESTEINATTORNEYS.COM](http://BLUESTEINATTORNEYS.COM)



**NOTICE:** This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.



March 12, 2026

BLUESTEIN THOMPSON SULLIVAN, LLC  
BLUESTEINATTORNEYS.COM

**RECEIVED**

**Mar 12 2026**

**SC Court of Appeals**

**VIA EMAIL ONLY- [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Shirley Reed vs OHM Florence, LLC  
Appellate Case No.: 2025-001115

Dear Ms. Kitchings,

Please find enclosed for filing Respondent's Final Brief, in reference to the above matter. I have enclosed a proof of service on counsel for the Appellant.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



---

Meredith Brown

Legal Assistant to John S. Nichols, Esq.  
Bluestein Thompson Sullivan, LLC

/mb

Enclosures

cc: John S. Nichols, Esq. ([john@bluesteinattorneys.com](mailto:john@bluesteinattorneys.com))  
J. Clarke Newton, Esq. ([clarke@bluesteinattorneys.com](mailto:clarke@bluesteinattorneys.com))  
Rodney C. Jernigan, Jr., Esq. ([rod@jerniganlaw.net](mailto:rod@jerniganlaw.net))  
J. David Banner, Esq. ([jdb@aikenbridges.com](mailto:jdb@aikenbridges.com))  
Robert H. Hood, Jr., Esq. ([bobbyjr.hood@hoodlaw.com](mailto:bobbyjr.hood@hoodlaw.com))  
Ryan C. Holt, Esq. ([rhc@swblaw.com](mailto:rhc@swblaw.com))  
Brian L. Craven, Esq. ([blc@swblaw.com](mailto:blc@swblaw.com))  
Madison K. Kea, Esq. ([mkk@swblaw.com](mailto:mkk@swblaw.com))  
Daniel Q. Atkinson, Esq. ([dqa@swblaw.com](mailto:dqa@swblaw.com))

COLUMBIA:

1614 TAYLOR STREET | PO BOX 7965 | COLUMBIA, SC 29202  
P • 803 779.7599 F • 803 771.8097