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July 1, 2026

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S.C. SUPREME COURT

VIA EMAIL ONLY- supctfilings@sccourts.org

The Honorable Patricia Howard
Clerk of Court
Supreme Court of South Carolina
1231 Gervais Street
Columbia, South Carolina 29201

RE: Gregg Roman, et al. vs. PNC Financial, et al.
Appellate Case No: 2026-000713

Dear Ms. Howard:

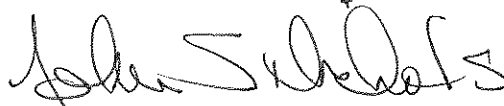
Pursuant to Mrs. Shealy's email of June 24, 2026, please find enclosed 10 copies of the Brief of Respondent. Also, the email requested 10 copies of any Appendix. Because this matter is under Rule 245, SCACR, there is no record of proceedings below directly related to the merits of Mr. Roman's dubious claims other than the subpoena for the bank records, the Motion to Quash with Mr. Roman's untested affidavit, and Judge Kelly's decision denying that motion and a subsequent motion for reconsideration. Mr. Smith has indicated he intends to file an Appendix containing those matters.

However, Respondents' arguments and the Court's decision are impacted by other evidence, some of it produced in the underlying litigation and other evidence separately obtained by Respondents. We are therefore proffering additional material for the Court to consider in the form of an Appendix. Since Rule 245 contemplates the Court would provide for discovery, fact finding and/or a briefing schedule, the normal course would be to refer this matter to a referee to accomplish the same pursuant to S.C. Code Ann. § 14-3-340 (1977). Respondents point this out in their Brief and suggest that procedure. In the interim, Respondents proffer this Appendix along with Proof of Service upon counsel for Mr. Roman.

One note about the contents of the Appendix. Respondents sought to proffer documents produced by the Parker Defendants and marked "confidential" in the underlying litigation. Respondents requested the Parker Defendants waive that designation but they refused. The confidentiality order (included in the Appendix) requires the Parker Defendants to seek a ruling from Judge Kelly by July 16, 2026. Respondents included a "place holder" page explaining this with a copy of the Confidentiality Order. Once Judge Kelly has ruled Respondents will file a supplemental appendix containing the material.

Please forward this letter to the Court members. Also, please let me know if the Court desires any additional information.

With kind regards,

A handwritten signature in black ink, appearing to read "John S. Nichols". The signature is fluid and cursive, with a large initial "J" and "S".

John S. Nichols, Esq.
Bluestein Thompson Sullivan, LLC

cc:

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