



W. Andrew Arnold
Shareholder
Admitted in SC

August 6, 2026

VIA ELECTRONIC FILING

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
ctappfilings@sccourts.org

RECEIVED

Aug 06 2026

SC Court of Appeals

Re: *Brow Art Management, LLC v. Angel Eyez and Brows, LLC*,
Appellate Case No. 2026-000941

Dear Ms. Kitchings:

Please file this letter in the above-captioned appeal and bring it to the attention of the Court. Respondents' Memorandum in Support of Defendants' Motion to Dismiss, included the following citation:

"Only parties to a contract can be held liable for its breach. *Raines v. Walker*, 262 S.C. 330, 204 S.E.2d 802 (1974)."

As Appellant has pointed out in its brief, this citation is inaccurate. *Raines v. Walker* does not exist. The inaccurate citation was also included in the proposed order submitted to the circuit court and was incorporated into the order granting Respondents' motion to dismiss.

The legal proposition was correct, but the cited authority was not. More specifically, *Raines v. Walker* does not exist. The authorities I had previously used for the proposition are:

"[A]n individual who is not a party to a contract generally cannot be liable for its breach." *Thomas Trancik, M.D., P.A. v. USAA Ins. Co.*, 354 S.C. 549, 554, 581 S.E.2d 858, 861 (Ct. App. 2003); *see also Holder v. Haskett*, 283 S.C. 247, 251, 321 S.E.2d 192, 194 (Ct. App. 1984).

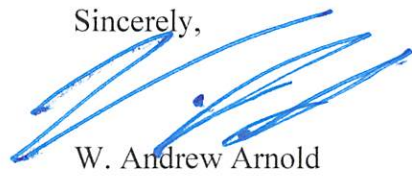
I had relied on these authorities for the stated proposition in a prior motion to dismiss. In preparing and editing the memorandum in this matter, however, the incorrect citation was used to support a proposition that I knew the underlying proposition to be true. I failed to perform my customary final LexisNexis verification of this citation.

Upon becoming aware of the issue, I confirmed the error and have voluntarily self-reported the matter to the Office of Disciplinary Counsel.

This letter is intended solely to correct the record concerning the inaccurate citation and to provide notice of my self-report. Respondents will address the substantive legal arguments advanced in Appellant's brief. Nothing in this letter should be understood as conceding Appellant's substantive arguments or as waiving any argument available to Respondents.

I regret the error and respectfully submit this notice promptly upon confirming it.

Sincerely,

A handwritten signature in blue ink, consisting of several overlapping, sweeping strokes that form the name 'W. Andrew Arnold'. The signature is positioned above the printed name.

W. Andrew Arnold