

RECEIVED

Aug 20 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY
Daniel Coble, Circuit Court Judge

Appellate Case No. 2026-000736

Kenneth B. Loveless, Appellant,

v.

Kevin Scully, Edward K. White, Flora E. "Beth" Hutchison,
Michael Montgomery and Beatrice Dennis-White, Respondents.

PROOF OF SERVICE

I, Beth Cogan, an employee with Law Offices of Desa Ballard, do hereby certify that on August 20, 2026, I served a copy of **Initial Reply Briefs of Appellant as to Respondent Beatrice Dennis-White, and Initial Reply Brief as to Respondents Michael Montrogmery, Respondents Ed White and Beth Hutchison and Designations of Matter**, in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

Andrew S. Radeker, Esquire
Radeker Law, P.A.
drew@radekerlaw.com

Taylor M. Smith IV, Esquire
Meriwether Law, LLC
taylor@harrisonfirm.com

David A. Anderson, Esquire
Richardson Plowden & Robinson, P.A.
danderson@RichardsonPlowden.com

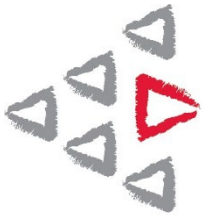
Eugene H. Matthews, Esquire
Richardson Plowden & Robinson, P.A.
gmatthews@RichardsonPlowden.com

Robert M. Peele III, Esquire
Turner, Padget, Graham, and Laney, P.A.
RPeele@TurnerPadget.com



Beth Cogan, Paralegal

August 20, 2026



Law Offices of Desa Ballard

PERSISTENT. UNWAVERING.

Desa Ballard
Haley Hubbard

226 State Street West Columbia, SC 29169
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

August 20, 2026

Via Email (ctappfilings@sccourts.org)

The Honorable Jenny Abbot Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Kenneth B. Loveless v. Kevin Scully, et. al.*
Case No.: 2022-CP-40-01307

Dear Ms. Kitchings:

Enclosed for filing, please find the Initial Reply Briefs and Proof of Service for the above-referenced matter. There are a total of two briefs being filed on behalf of the following:

- (1) Respondent B. White; and
- (2) Respondents Michael Montgomery, Ed White and Beth Hutchison

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent. If you have any questions, please do not hesitate to contact our office.

With warm personal regards, I am,

Sincerely yours,

Haley Hubbard
haley@desaballard.com

Enclosures

cc: Via Email

Drew Radeker, Esquire
Taylor Smith IV, Esquire
David A. Anderson, Esquire
Eugene H. Matthews, Esquire
Robert Peele III, Esquire
Ken Loveless