

## Siecinski, Amanda

---

**From:** Sarah Timmons <sarah@timmonsbrogdon.com>  
**Sent:** Tuesday, August 25, 2026 8:29 AM  
**To:** Court Of Appeals Filings; Solange Feliz  
**Subject:** Re: Appellate Case No. 2025-002429 - Respondent's Final Brief and Letter to the Court

\*\*\* **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

This email serves to confirm to the court and Appellant that it has come to counsel's attention that there have been issues with delivery of shipments by UPS and FedEx at counsel's address. Therefore, counsel is confirming that mail (not shipped by USPS) can be delivered to Counsel's P.O. Box 9583, Greenville, SC 29604.

Please advise if this needs to be in a formal letter.

Respectfully,

Sarah Timmons  
Timmons Brogdon Law Firm, LLC  
25 Delano Drive, Suite E  
Greenville, SC 29601  
(864) 906-0289

sarah@timmonsbrogdon.com

[https://protect.checkpoint.com/v2/r01/\\_\\_\\_www.timmonsbrogdon.com\\_\\_\\_YzJ1OnNjanVkaWNpYWw6YzpvOjRkOGViZGEyZDQ5ZTkYOTBkYmM5ZWZmNmQ0DE3MjJmOjc6ZTNiNToxZTc4OTU3OGVmMWYyNGFIYjBhNjZjMGJIMWEyYjU3YjA2NTJlOTQwMjAyNDk5M2Y2NzE4YzIzZGM3MzVmYjQ0OnQ6VDpO](https://protect.checkpoint.com/v2/r01/___www.timmonsbrogdon.com___YzJ1OnNjanVkaWNpYWw6YzpvOjRkOGViZGEyZDQ5ZTkYOTBkYmM5ZWZmNmQ0DE3MjJmOjc6ZTNiNToxZTc4OTU3OGVmMWYyNGFIYjBhNjZjMGJIMWEyYjU3YjA2NTJlOTQwMjAyNDk5M2Y2NzE4YzIzZGM3MzVmYjQ0OnQ6VDpO)

NOTICE: This e-mail may contain information that is personal and confidential, non-disclosable and protected by attorney/client privilege. If you have received this e-mail in error, this does not constitute permission to examine, copy or distribute the accompanying material. If you receive this message in error, please notify us by telephone as listed above immediately. If you need to schedule a call or appointment with me, please message my assistant Haden Brogdon at [haden@timmonsbrogdon.com](mailto:haden@timmonsbrogdon.com) or call her at (334)300-0347.

---

**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Date:** Tuesday, August 18, 2026 at 8:24 AM  
**To:** Solange Feliz <solangefeliz07@gmail.com>, sarah@timmonsbrogdon.com  
<sarah@timmonsbrogdon.com>, Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Subject:** RE: Appellate Case No. 2025-002429 - Respondent's Final Brief and Letter to the Court

The Court has received your filing. A stamped copy is attached for your records.

Thank you!

**RECEIVED**  
**Aug 25 2026**  
**SC Court of Appeals**



**South Carolina Court of Appeals**  
**Clerk's Office**  
1220 Senate Street  
Columbia, SC 29201  
Filings: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
Phone: (803) 734-1890

---

**From:** Solange Feliz <solangefeliz07@gmail.com>  
**Sent:** Monday, August 17, 2026 5:44 PM  
**To:** sarah@timmonsbrogdon.com; Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Subject:** Re: Appellate Case No. 2025-002429 - Respondent's Final Brief and Letter to the Court

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

I hereby formally request that attorney Sarah Timmons confirm in writing the **complete, accurate, and current address at which she wishes to receive physical copies of briefs, notices, and any other documents related to this proceeding.**

This request has become necessary due to the issues that have arisen with the delivery of physical documents and prior statements concerning the non-receipt of such copies.

I have made good-faith efforts to send the appropriate documents using the address information provided for counsel. However, UPS, a company specializing in the transportation and delivery of correspondence and packages, has now provided written information explaining why it was unable to complete certain deliveries to the address provided.

Specifically, **UPS stated in writing that its driver attempted to make the delivery but was unable to locate the indicated location.** According to UPS's report, at that address, **the suites extend only through Suite D, and no Suite E could be located.** UPS further reported that its driver **inquired with businesses located next to the indicated law firm, and none of them was able to identify or confirm the existence of the referenced firm at that location.**

I am attaching to this email the written communication from **UPS Customer Service** so that both the Court and attorney Timmons have a direct record of the information provided by the company responsible for making the delivery.

I believe it is important that this circumstance be clearly documented in light of any present or future issue concerning the alleged non-receipt of physical copies. The available records demonstrate that efforts were made to complete the shipments and that, at least with respect to the deliveries documented by UPS, **the inability to complete delivery was related to the destination address and the carrier's inability to locate the indicated Suite E**, rather than simply an omission to send the documents.

Attorney Timmons subsequently acknowledged by email that UPS had experienced delivery issues and requested that the documents be sent going forward to:

**Timmons Brogdon Law Firm, LLC**  
**P.O. Box 9583**  
**Greenville, SC 29604**

To avoid any further dispute regarding the receipt of documents and to maintain a clear and verifiable record for this proceeding, I respectfully request that **attorney Timmons expressly confirm, in writing and with the Court copied, whether the P.O. Box listed above is the correct, complete, and current address that should be used for all future physical mailings related to this case.**

If that is not the address that should be used for purposes of service or mailing, I request that the **correct and exact address** be provided, including the street number, suite or unit number—if applicable—city, state, and ZIP Code.

The purpose of this request is to ensure that future deliveries are made using information expressly confirmed by counsel and, at the same time, to **preserve an accurate record of the circumstances that have caused the prior delivery problems**, particularly in connection with any future assertion concerning the non-receipt of documents.

I would appreciate written confirmation of the correct address so that both the parties and the Court have an unequivocal record of the information that should be used going forward.

Respectfully,

**Kendry Solange Tavaréz Feliz**  
On behalf of Jesús Concepción

El jue, 13 ago 2026 a las 11:17, [sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com) (<[sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com)>)  
escribió:

Kendry,

I hope this email finds you well. I received notice that UPS had issues as well. My apologies for this inconvenience. I'm not sure what is happening, because I have never had this issue before. If you can please send it to my P.O. Box, that should resolve the issue. The address is:

Timmons Brogdon Law Firm, LLC  
P.O. Box 9583  
Greenville, SC 29604

Thank you,

Sarah Timmons  
Timmons Brogdon Law Firm, LLC  
25 Delano Drive, Suite E  
Greenville, SC 29601  
(864)906-0289

NOTICE: This e-mail may contain information that is personal and confidential, non-disclosable and protected by attorney/client privilege. If you have received this e-mail in error, this does not constitute permission to examine, copy or distribute the accompanying material. If you receive this message in error, please notify us by telephone as listed above immediately.

---

**From:** Solange Feliz <[solangefeliz07@gmail.com](mailto:solangefeliz07@gmail.com)>

**Date:** Saturday, August 8, 2026 at 5:33 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** [sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com) <[sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com)>

**Subject:** Re: Appellate Case No. 2025-002429 - Respondent's Final Brief and Letter to the Court

Sarah Timmons

Timmons Brogdon Law Firm, LLC

25 Delano Drive, Suite E

Greenville, SC 29601

(864)906-0289

NOTICE: This e-mail may contain information that is personal and confidential, non-disclosable and protected by attorney/client privilege. If you have received this e-mail in error, this does not constitute permission to examine, copy or distribute the accompanying material. If you receive this message in error, please notify us by telephone as listed above immediately.

Dear Clerk of Court and Ms. Timmons:

I write to clarify the mailing and service of Appellant's Final Brief in response to Ms. Timmons's August 6, 2026 letter stating that Respondent had not received a paper copy by mail.

The paper package was in fact sent on **July 24, 2026** to Respondent's counsel. However, after shipment, an issue occurred during the carrier's delivery process and the package was subsequently returned to sender. Accordingly, the fact that Respondent did not ultimately receive that particular package was the result of the unsuccessful delivery and return of the shipment, rather than a failure to send the required copy.

Under **Rule 262(c)(2), SCACR**, service by U.S. mail is complete upon mailing when the copy is properly addressed and sufficient first-class postage is attached. Rule 208 likewise requires service of the brief upon the parties and filing with the Court accompanied by proof of service. The July 24 shipment was undertaken for that purpose.

Upon learning that the original shipment had been returned, the matter was promptly corrected. **A replacement package has been sent today to Respondent's counsel.** Attached to this email are the available shipping documentation and tracking information reflecting both the prior shipment and the replacement shipment so that the mailing history and current delivery status may be independently verified.

This correspondence is submitted simply to clarify the record regarding service and to document the corrective action taken following the carrier's unsuccessful delivery.

Thank you for your attention to this clarification.

Respectfully submitted,

**Jesús Concepción**

Appellant, Pro Se

Appellate Case No. [2025-002429](#)

Lower Court Case No. 2022-CP-23-00240

Spartanburg County Detention Center

950 California Avenue

Spartanburg, South Carolina 29303

El El vie, ago 7, 2026 a la(s) 9:24 a.m., Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)> escribió:

The Court has received your filing. A stamped copy is attached for your records.

Thank you!

---

**From:** [sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com) <[sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com)>

**Sent:** Thursday, August 6, 2026 6:43 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Solange Feliz <[solangefeliz07@gmail.com](mailto:solangefeliz07@gmail.com)>; [sarah@timmonsbrogdon.com](mailto:sarah@timmonsbrogdon.com)

**Subject:** Appellate Case No. 2025-002429 - Respondent's Final Brief and Letter to the Court

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Clerk of Court and Mr. Concepcion:

We respectfully submit Respondent's Final Brief, Proof of Service and Letter to the Court for the Court's consideration. A paper copy has been mailed to the Court and Mr. Concepcion and I will send the mailing receipt shortly.

Respectfully submitted,

Sarah Timmons

Timmons Brogdon Law Firm, LLC

[25 Delano Drive, Suite E](#)

[Greenville, SC 29601](#)

(864)906-0289

NOTICE: This e-mail may contain information that is personal and confidential, non-disclosable and protected by attorney/client privilege. If you have received this e-mail in error, this does not constitute permission to examine, copy or distribute the accompanying material. If you receive this message in error, please notify us by telephone as listed above immediately.

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.