



**Ballard  
Watson Weissenstein**  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M. Watson III  
Stephanie Weissenstein  
Attorneys at Law

Post Office Box 6338 | West Columbia, SC 29171

Thursday, January 23, 2014 | 226 State Street | West Columbia, SC 29169 | ph 803.796.9299 | fx 803.796.1066 | [desaballard.com](http://desaballard.com)

*Via U.S. Mail and Facsimile*

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *Ex Parte Desa Ballard v. Tony R. Megna; In Re: Pee-Dee HealthCare v.  
Estate of Hugh Thompson*  
Appellate tracking No.: 2013-001461

Dear Ms. Kitchings:

Please accept this letter as Respondent's return to Appellants' request for an extension of time to prepare the Record on Appeal in the above referenced matter. We understand the Record on Appeal is due on February 3, 2014. Appellants' request for an extension of time is based on their need to obtain various documents from us. My staff member was out ill at the time the initial email was received from Ms. Harmon (Exhibit A). Upon her return on January 20, 2014, my staff member emailed Appellant's counsel the requested documents (Exhibit B).

I am not objecting to the extension of time, as I certainly understand the pressures of a busy practice. However, I did want the Court to be aware that my office is not holding up the preparation of the Record, and we provided everything to them in a prompt manner upon their request.

Thank you for your time and attention to this matter. With warm personal regards, I am,

Sincerely yours,

Desa Ballard  
[desa@desaballard.com](mailto:desa@desaballard.com)

c: (Via US Mail and Email)  
Ariah King, Esquire  
Jim Griffin, Esquire  
Cam Lewis, Esquire  
Douglas Truslow, Esquire

**RECEIVED**

JAN 27 2014

**SC Court of Appeals**



**From:** Jaime L. Harmon  
**To:** Mara Ballard  
**Subject:** Ballard v. Tony Megna - Record on Appeal  
**Date:** Wednesday, January 15, 2014 4:30:20 PM  
**Attachments:** DOCS NEEDED FROM BALLARD.docx

---

Good afternoon Mara,

I am writing to see if you could possibly help me with a few documents I do not have in my possession that were listed in Ms. Ballard's Designation of Matter in the above-referenced matter.

I have attached the list and any help you could offer would be greatly appreciated it.

---

Jaime Harmon  
Assistant to James M. Griffin and Margaret N. Fox  
Lewis, Babcock & Griffin, L.L.P.  
1513 Hampton Street  
Post Office Box 11208  
Columbia, South Carolina 29211  
(803)771-8000  
(803)733-3541 (Fax)

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**RECEIVED**

JAN 27 2014

**SC Court of Appeals**

**From:** [Jaime L. Harmon](#)  
**To:** [Mara Ballard](#)  
**Subject:** FW: Ballard v. Tony Megna - Record on Appeal  
**Date:** Friday, January 17, 2014 12:31:25 PM  
**Attachments:** [DOCS NEEDED FROM BALLARD.docx](#)

---

Good afternoon Ms. Ballard,

I was wondering if you have had an opportunity to review the attached list and to see if you have any of the documents scanned in that you can send me.

Thank you

---

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**From:** Jaime L. Harmon  
**Sent:** Wednesday, January 15, 2014 4:39 PM  
**To:** 'mara@desaballard.com'  
**Subject:** Ballard v. Tony Megna - Record on Appeal

Good afternoon Mara,

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**From:** Mara Ballard  
**To:** Jaime L. Harmon  
**Cc:** Mara Ballard  
**Subject:** RE: Ballard v. Tony Megna - Record on Appeal  
**Date:** Monday, January 20, 2014 11:46:17 AM

---

Ms. Harmon,

Appologies, I was out sick last week and am now just seeing this. Let me see what I can pull together for you.

Mara T. Ballard, CMA, CFE  
Forensic Accountant (not a lawyer)  
Ballard Watson Weissenstein  
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---

**From:** Jaime L. Harmon [mailto:jlh@lblegal.com]  
**Sent:** Friday, January 17, 2014 12:40 PM  
**To:** Mara Ballard  
**Subject:** FW: Ballard v. Tony Megna - Record on Appeal

Good afternoon Ms. Ballard,

I was wondering if you have had an opportunity to review the attached list and to see if you have any of the documents scanned in that you can send me.

Thank you

---

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**From:** [Mara Ballard](#)  
**To:** [jlh@lbolegal.com](mailto:jlh@lbolegal.com)  
**Cc:** [Desa Ballard](#); [Mara Ballard](#)  
**Subject:** Megna : documents for ROA  
**Date:** Monday, January 20, 2014 11:55:06 AM  
**Attachments:** [Order disqualifying Megna and filings 08-15-2011.pdf](#)  
[Suggs encl redacted NOI 02-17-2012-.pdf](#)  
[Supplemental Affidavit of Truslow \(Clocked\) - 11.09.11.pdf](#)  
[Affidavit of Truslow \(Clocked\) - 10.19.11.pdf](#)

---

Jamie,

Here are four I found right off the bat and thought I'd send them to you while I hunt the others.

Mara

Your message is ready to be sent with the following file or link attachments:

[Order disqualifying Megna and filings 08-15-2011.pdf](#)  
[Suggs encl redacted NOI 02-17-2012-.pdf](#)  
[Supplemental Affidavit of Truslow \(Clocked\) - 11.09.11.pdf](#)  
[Affidavit of Truslow \(Clocked\) - 10.19.11.pdf](#)

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

**From:** [Mara Ballard](#)  
**To:** [jlh@lblegal.com](mailto:jlh@lblegal.com)  
**Cc:** [Desa Ballard](#); [Mara Ballard](#)  
**Subject:** Megna: Last 2 items requested for ROA  
**Date:** Monday, January 20, 2014 12:02:01 PM  
**Attachments:** [Subpoena with exhibits - 07.27.11.pdf](#)  
[COC package encl Addl req for info for NOI.pdf](#)

---

I believe these are the last two items you were looking for.

It there is anything else I can help with, please let me know.

Mara

Mara T. Ballard, CMA, CFE  
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**From:** [Jaime L. Harmon](#)  
**To:** [Mara Ballard](#)  
**Subject:** RE: Ballard v. Tony Megna - Record on Appeal  
**Date:** Tuesday, January 21, 2014 8:50:52 AM

---

Thank you Mara. I hope you are feeling better.

---

Jaime Harmon  
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**From:** Mara Ballard [mailto:[Mara@desaballard.com](mailto:Mara@desaballard.com)]  
**Sent:** Monday, January 20, 2014 11:46 AM  
**To:** Jaime L. Harmon  
**Cc:** Mara Ballard  
**Subject:** RE: Ballard v. Tony Megna - Record on Appeal

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**CERTIFIED FRAUD  
EXAMINER**

---

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**Sent:** Friday, January 17, 2014 12:40 PM  
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SC Court of Appeals

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29211 11629 5012

