

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
JUL 10 2012

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Alison Renee Lee, Circuit Court Judge

Case No. 09-CP-40-2219

Marie Assa'ad-Faltas, MD, MPH,.....Respondent,

v.

Dinah Steele; Steele Enterprises and/or AAA
Investments, a business; Larry Roe; Sharon
B. Koon; Eugene W. (Buddy) Koon, Jr.;
Eugene W. (Trip) Koon, III; Evers-Koon and
or EKG of South Carolina, a business; Jane
Doe; and other unknown-named persons and
entities who injured Plaintiff,.....Defendants,

of whom
Dinah Steele and Larry Mason are the,.....Appellants.

**APPELLANTS' RETURN IN OPPOSITION
TO MOTION WITH REGARD TO LISTED COUNSEL OF RECORD
FOR RESPONDENT PRO BONO**

Pursuant to Rule 240, SCACR, Appellants Dinah Steele and Larry Mason hereby respond in opposition to Respondent Marie Assa'ad Faltas' and Orin G. Briggs' motion to hold this matter in abeyance, extending the Remittitur date, "pending the disposal of the representation issue." As set forth below, both Respondent Faltas and Mr. Briggs were aware that this Court and Appellants both treated him as if and believed that he was serving as counsel of record for Respondent Faltas in this appeal. If in fact Mr. Briggs

has not been serving as Respondent's counsel in this appeal, there has been ample time for Respondent Faltas and Mr. Briggs to notify this Court and Appellants and for Respondent Faltas to obtain new counsel.

The South Carolina Supreme Court's April 15, 2011 letter to Respondent Faltas clearly informed her that any filings with any courts in the state of South Carolina "will have to be prepared by an attorney, be submitted to this Court for Approval prior to filing and be filed by an attorney." (Exh A). Although Mr. Briggs states he has no knowledge regarding the Supreme Court's order regarding "no self-representation," while acting as her "volunteer temporary counsel" in this appeal, Mr. Briggs submitted his motion for an extension of time on Ms. Faltas' behalf "for approval by the Supreme Court of South Carolina ..."¹

This Court granted the motion and notified all of the parties via a letter dated May 24, 2011 addressed to Mr. Briggs. (Exh C). Subsequently, this Court dismissed Respondent Faltas' cross-claims in an Order dated August 3, 2011, and filed a Partial Remittitur on August 10, 2011, serving both Mr. Briggs and Respondent Faltas. (Exh D). An August 22, 2011 letter addressed to the undersigned as counsel for Appellants and to Mr. Briggs as counsel for Respondent advised that, due to Respondent's failure to file her initial brief, the Record on Appeal and Final Briefs should be filed. (Exh E). When Appellants filed a Motion for Clarification of Letter Regarding Record on Appeal, they received a telephone call from the Clerk's office, on or about September 8, 2011, advising that the motion had to be amended in order to add Mr. Briggs to the proof of service as Respondent Faltas' counsel. Appellants' Amended Motion for Clarification of

¹ Respondent/Appellant's Motion for a Sixty-day Extension of Time To File her Amended Brief and Designation of Matter And to Suspend the Time Lines of This Appeal Pending Decision of this Motion, May 5, 2011. (Exh. B).

Letter Regarding Record on Appeal, filed September 8, 2011, clearly identifies Mr. Briggs as attorney of record for Respondent. (Exh F). This Court subsequently served Mr. Briggs and Respondent Faltas with its October 21, 2011 Order regarding the Record on Appeal. (Exh G). On November 9, 2011, Appellants served the Record on Appeal and their Final Brief, again identifying Mr. Briggs as counsel for Respondent Faltas. (*See, for example*, Exh H). On April 23, 2012, in a letter addressed to the undersigned as counsel for Appellants and to Mr. Briggs as counsel for Respondent, this Court advised the parties that it would decide this appeal on the record. (Exh I).


Thus, there have been no fewer than nine filings with this Court over a span of fourteen months that were served on Mr. Briggs as counsel for Respondent Faltas and/or identified him as such. At a minimum, as an officer of the Court, Mr. Briggs was under a duty to advise this Court and the other parties that he was not representing Respondent Faltas when he saw he was designated as her counsel of record these various filings. In addition, to the extent Respondent Faltas had not finalized any arrangements for Mr. Briggs to represent her in this appeal, she has had more than sufficient time to obtain counsel. Respondent Faltas and Mr. Briggs were in the best position to know what her status of representation was but, for fourteen months, did nothing either to advise the Court or Appellants that Mr. Briggs was not serving as counsel or to obtain new counsel.

The time for either Mr. Briggs to advise both this Court and Appellants that he did not actually represent Respondent Faltas in this appeal was long ago, not three days before the remittitur was scheduled to be sent out. Likewise, to the extent he was not representing Respondent Faltas in this appeal, the time for her to obtain substitute counsel has long passed. In any event, both Mr. Briggs and Respondent Faltas were aware as of

April 23, 2012 that this Court was preparing to render its decision on this appeal, and had sufficient time to resolve the representation issue and/or obtain other counsel.

Thus, Appellants request that this Court deny Respondent and Mr. Briggs' Motion and either require Mr. Briggs to continue to represent Respondent through the end of this appeal,² or find that Respondent Faltas has had sufficient time to obtain replacement counsel but has failed to do so. In the event this Court requires Mr. Briggs to continue to represent Respondent in this appeal, the time remaining in the period for submitting a petition for rehearing should be allowed to run and the remittitur sent unless Respondent files a proper motion for rehearing within three (3) days of this Court's ruling on this Motion.³ Alternatively, this Court should rule that Mr. Briggs has not been serving as Respondent Faltas' counsel and that she has had ample time to find substitute counsel. Because she apparently has not done so over the past fourteen months and has failed to file a petition for rehearing by July 5, 2012, this appeal has concluded and the remittitur should be sent.

Respectfully submitted,


J. Andrew Delaney
MCANGUS GOUDELOCK & COURIE, L.L.C
Meridian 10th Floor
1320 Main Street
PO Box 12519
Columbia, SC 29211-2519
(803) 779-2300
Attorney for Appellants
Dinah Steele and Larry Mason

July 10, 2012

² Mr. Briggs has not provided any basis for his request to be relieved of representation, and allowing him to withdraw at this late date could have a material adverse effect on Respondent Faltas' interests.

³ The deadline to petition this Court for rehearing of its June 20, 2012 Order was July 5, 2012. Rule 221, SCACR. Respondent and Mr. Briggs' Motion was filed on July 2, 2012, leaving three (3) days remaining in the period during which a petition for rehearing must be submitted.

Exhibit A



The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211

(803) 734-1080

FAX (803) 734-1499

April 15, 2011

Dr. Marie Assa'ad Faltas
PO Box 9115
Columbia, SC 29290

Re: Faltas, Marie Assa'ad v. Steele, Dinah

Dear Dr. Faltas:

This responds to your letter which was received yesterday. No action will be taken on this letter for two reasons.

First, this Court cannot consider *ex parte* communications about a case that is pending before the South Carolina Court of Appeals.

Second, the order of this Court dated April 8, 2011, is very specific. If it is appropriate for any document to be filed with any court of this State on your behalf, that filing will have to be prepared by an attorney, be submitted to this Court for approval prior to filing and be filed by an attorney. This includes asking for an extension of time to file a brief in an appeal pending before the Court of Appeals.

As to your request for this Court to grant you an extension or to allow you to file a *pro se* brief in the above matter, I cannot accept this request for filing since it has not been prepared and filed an attorney. Please do not attempt to file any documents with either this Court or the Court of Appeals which are not in full

compliance with this Court's order of April 8, 2011. If further *pro se* documents are sent to this office in violation of the order of April 8, 2011, they will simply be ignored.

By copy of this letter, I am providing the Court of Appeals and opposing counsel with a copy of the order of April 8, 2011.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. E. Shearouse', with a long horizontal line extending to the right.

Daniel E. Shearouse

cc: J. Andrew Delaney, Esquire (with copy of order)
C. Edward Rawl, Jr., Esquire (with copy of order)
The Honorable Tanya Gee (with copy of order)

The Supreme Court of South Carolina

The City of Columbia, Respondent,

v.

Marie Assa'ad-Faltas, MD,
MPH, Appellant.

ORDER

On January 28, 2011, appellant filed a document in the Court of Appeals entitled "Notice of Appeal from the Circuit Court's Unwillingness/Inability to Schedule a Hearing on the Underlying Appeals from Municipal Court or, in the Alternative, Motion for This Court to Directly Hear Those Appeals and Emergency Motion for this Court to Direct Circuit and Municipal Courts to not Incarcerate Appellant Unless and Until this Court Hears Her Appeals." By order dated February 1, 2011, Chief Judge Few stated, "This appeal is dismissed as not immediately appealable. In the alternative, Appellant moves this Court to entertain her appeals, which we decline to do."

Thereafter, appellant filed a document entitled "Timely Petition for Rehearing En Banc of the Honorable Chief Judge's Decision Which has


the Effect of Dismissing these Combined Appeals from the Circuit Court's Unwillingness/Inability to Schedule a Hearing on the Underlying Appeals from Municipal Court or, in the Alternative, Motion for this Court to Directly Hear those Appeals Itself or this Court to Direct Circuit and Municipal Courts to Set a Date Certain to Hear Appellant's Cases and her Appeals or Dismiss the Charges Against Her." By order dated March 11, 2011, the appeal was certified to this Court pursuant to Rule 204(b), SCACR.

Since the matter was certified to this Court, appellant has filed documents entitled "Motion for a Briefing Schedule and Order and Emergency Motion for this Court to Direct Circuit and Municipal Courts to not Incarcerate Appellant Unless and Until this Court Hears Her Appeals" and "Extreme Emergency Supplement to Appellant's Emergency Motion for this Court to Protect Her from False Incarceration." The petition, motions and supplement are all denied.


Moreover, due to the frivolous, repetitive and abusive nature of appellant's filings in this Court and other courts in this state, we hereby prohibit appellant from filing anything in the courts of this state in a pro se capacity. Appellant is not precluded from addressing any grievances she may have in the courts of this state, assuming she is represented by counsel and

such grievances are not frivolous. We therefore direct the clerks of court in this state not to accept any filings from appellant unless they have been prepared by an attorney, submitted by the attorney to this Court first for approval, and filed by the attorney. Petitioner is hereby warned that a violation of this order will be grounds for contempt.

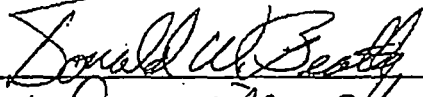
IT IS SO ORDERED.



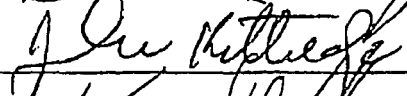
C. J.



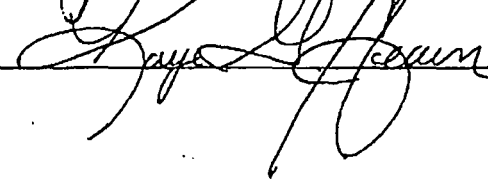
J.



J.



J.



J.

Columbia, South Carolina

April 8, 2011

Exhibit B

Before the South Carolina Court of Appeals

Marie Assa'ad-Faltas, MD, MPH,
Respondent/Appellant
v.

Dinah Steele, *et al.*,
Of Whom Dinah Steele and Larry Mason are
Appellants/Respondents

RECEIVED
MAY 05 2011
SC Court of Appeals

On Appeal from Richland County Circuit Court of Common Pleas
The Honorable Allison Renee Lee

**Respondent/Appellant's Motion for a Sixty-day Extension of Time
To File her Amended Brief and Designation of Matter
And to Suspend the Time Lines of This Appeal Pending Decision of this Motion**

Through her undersigned volunteer temporary counsel, who submitted this motion for approval by the Supreme Court of South Carolina, Respondent/Appellant respectfully seeks from this Court a sixty-day extension of time due to the very unusual and unexpected circumstances under which she finds herself.

Respondent/Appellant's volunteer temporary counsel has read the Honorable Judge Lee's ORDER FOR PRELIMINARY INJUNCTION, which is subject to this appeal and believes it to be (except for the part from which Respondent/Appellant cross-appealed) an excellent order which should be affirmed against Appellants/Respondents' challenge to it. But the undersigned volunteer temporary counsel has not had a chance to look at the entire record and decide whether he can represent her fully in this appeal or she may need to seek different counsel.

Further, Respondent/Appellant served sixteen days in jail totally unexpectedly before the time her Responden/Appellant's brief and designation of matter were due. That proximately stemmed from the very conduct described in the the Honorable Judge Lee's ORDER FOR PRELIMINARY INJUNCTION. It would be very unfortunate and very unfair indeed if the very conduct against which the injunction is directed would succeed

through the back door in preventing Respondent/Appellant from defending that very injunction against appeals.

WHEREFORE, this Court is prayed to grant Respondent/Appellant a sixty-day extension of time and to stay the time lines of this appeal pending adjudication of this motion.

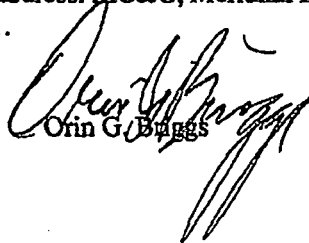
Respectfully submitted on May 5, 2011



Orin G. Briggs

Certificate of Service

I, Orin G. Briggs, hereby certify that I served this document today, May 5, 2011, by first-class U.S. mail properly addressed to J. Andrew Delaney and Edward Rawls, counsel for Appellants/Respondents, at their address: MC&G, Meridian Building, 10th floor, 1320 Main Street, Columbia, SC 29201.



Orin G. Briggs

Exhibit C



The South Carolina Court of Appeals

TANYA A. GRE
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMMIT STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE (803) 734-1896
FAX (803) 734-1839
www.sccourts.org

May 24, 2011

Orin Gail Briggs, Esquire
Orin Briggs, PA
P.O. Box 85085
Lexington, SC 29073-0022

Re: Faltas, Marie Assa'ad v. Steele, Dinah
2010153027

Dear Mr. Briggs:

The following Order has been endorsed on your Motion for a Sixty-day Extension of Time to File Amended Brief and Designation of Matter in the above entitled case on appeal.

"Granted.

s/Jasper M. Cureton A.J.

May 24, 2011 ."

Please be advised the Appellant's Initial Brief and Designation of Matter of the Respondent/Appellant must be served and filed no later than July 25, 2011.

Very truly yours,

V. Claire Allen, Deputy
CLERK

TAG/laf

cc: J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire

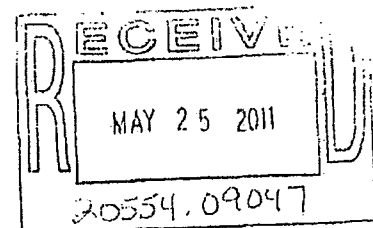


Exhibit D

The South Carolina Court of Appeals

Marie Assa'ad Faltas, MD, MPH,

Respondent/Appellant,

v.

Dinah Steele, Steele Enterprises and/or
AAA Investments, a business; Larry
Roe; Sharon B. Koon; Eugene W.
(Buddy) Koon, Jr.; Eugene W. (Trip)
Koon III; Evers-Koon and or EKG of
South Carolina, a business; Jane Doe;
and other unknown-named persons and
entities who injured Plaintiff,

Defendants,

of whom

Dinah Steele and Larry Mason are the, Appellants/Respondents.

The Honorable Alison Renee Lee
Richland County
Trial Court Case No. 2009-CP-40-02219

Partial ORDER of DISMISSAL

The above entitled case is pending on appeal in this Court. Due to the failure of respondent/appellant to serve and file the Appellant's Initial Brief and Designation of Matter of the Respondent/Appellant in the above matter, as provided for in Rule 208 and 209 of the South Carolina Appellate Court Rules,

IT IS ORDERED that the above captioned appeal of the Respondent/Appellant be and hereby is dismissed. Pursuant to Rule 221(b) of the South Carolina Appellate Court Rules, the remittitur in the case will be sent to the Clerk of Court for Richland County after fifteen (15) days, exclusive of the date of filing this Order.

V. Claire Allen, Deputy CLERK
For the Court

Columbia, South Carolina
cc: J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire
Marie Assa'ad Faltas
Orin Gail Briggs, Esquire
The Honorable Jeanette W. McBride

FILED

8/3/11 J/S

The South Carolina Court of Appeals

Marie Assa'ad Faltas, MD, MPH,

Respondent/Appellant,

v.

Dinah Steele, Steele Enterprises and/or
AAA Investments, a business; Larry
Roe; Sharon B. Koon; Eugene W.
(Buddy) Koon, Jr.; Eugene W. (Trip)
Koon III; Evers-Koon and or EKG of
South Carolina, a business; Jane Doe;
and other unknown-named persons and
entities who injured Plaintiff,

Defendants,

of whom

Dinah Steele and Larry Mason are the,

Appellants/Respondents.

The Honorable Alison Renee Lee
Richland County
Trial Court Case No. 2009-CP-40-02219

Partial REMITTITUR

No Petition for Reinstatement having been filed by the Respondent/Appellant, Marie Assa'ad Faltas, in the above matter since issuance of this Court's Order dated August 3, 2011,

IT IS SO ORDERED that the above appeal of the Respondent/Appellant, Marie Assa'ad Faltas, be and hereby is remitted.

V. Claire Allen, Deputy Clerk
For the Court

Columbia, South Carolina
Original to: The Honorable Jeanette W. McBride
cc: J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire
Marie Assa'ad Faltas
Orin Gail Briggs, Esquire

8/19/11
FILED

Exhibit E



AUG 22 2011

20554.09047

The South Carolina Court of Appeals

TANYA A. GEE
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMMIT STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE (803) 734-1800
FAX: (803) 734-1819
www.sccourts.org

August 22, 2011

J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire
McAngus Goudelock & Courie, LLC
P.O. Box 12519
Capitol Station
Columbia, SC 29211-2519

Orin Gail Briggs, Esquire
Orin Briggs, PA
P.O. Box 85085
Lexington, SC 29073-0022

Re: Faltas, Marie Assa'ad v. Steele, Dinah
2010153027

Dear Counsel:

Please be advised our records indicate that respondent has not served and filed an initial brief and designation of material, as provided for in Rules 208 (a) (2) and 209 of the South Carolina Appellate Court Rules. Therefore, you should proceed to serve and file your final brief and file the Record on Appeal, as provided for in Rules 210 (b) and 211 (a) within twenty (20) days of the date of this letter.

Furthermore, the caption should read as follows:

Marie Assa'ad Faltas, MD, MPH,

Respondent,

v.

Dinah Steele, Steele Enterprises and/or AAA Investments, a business; Larry Roe; Sharon B. Koon; Eugene W. (Buddy) Koon, Jr.; Eugene W. (Trip) Koon III; Evers-Koon and or EKG of South Carolina, a business; Jane Doe; and other unknown-named persons and entities who injured Plaintiff,

Defendants,

of whom Dinah Steele and Larry Mason are the,

Appellants.

Any future filings by any party to this appeal must feature the above caption.

Very truly yours,

V. Claire Allan, Deputy
CLERK

TAG/laf

cc: Marie Assa'ad Faltas

Exhibit F



ATTORNEYS AT LAW

Reply To
J. ANDREW DELANEY
Direct Dial: (803) 227-2313
adelaney@mgclaw.com
COLUMBIA

September 8, 2011

Via Hand Delivery
The Honorable Tanya Gee
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
SEP 08 2011
SC Court of Appeals


RE: Marie Assa'ad Faltas, MD MPH v. Dinah Steele; Steele Enterprises and/or AAA Investments, a business; Larry Roe, Sharon B. Koon; Eugene W. (Buddy) Koon, Jr.; Eugene W. (Trip) Koon, III Evers-Koon and/or EKG of South Carolina, a business; Jane Doe and other unknown-named persons who injured the Plaintiff
Our File No.: 20554.09047
Civil Action No. 09-CP-40-2219
Claim No.: 7752715313
Case Tracking No.: 2010-153027

Dear Ms. Gee:

Enclosed please find the original and seven (7) copies of Amended Appellants' Motion for Clarification of Letter Regarding Record on Appeal and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return the clocked-in copies via our courier.

If you have any questions, please contact me.

Yours truly,


J. Andrew Delaney

Enclosures
JAD/

cc: Alice Price Adams, Esq., Murphy & Grantland, P.A.
Robert A. McKenzie, Esq., McDonald, McKenzie, Rubin, Miller & Lybrand, LLP
Orin Gail Briggs, Esquire, Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Court Judge

Case No. 09-CP-40-2219

RECEIVED
SEP 08 2011
SC Court of Appeals

Marie Assa'ad-Faltas, MD, MPH,.....Respondent,

v.

Dinah Steele; Steele Enterprises and/or AAA
Investments, a business; Larry Roe; Sharon
B. Koon; Eugene W. (Buddy) Koon, Jr.;
Eugene W. (Trip) Koon, III; Evers-Koon and
or EKG of South Carolina, a business; Jane
Doe; and other unknown-named persons and
entities who injured Plaintiff,.....Defendants,

of whom

Dinah Steele and Larry Mason are the,Appellants.

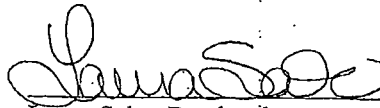
PROOF OF SERVICE

I certify that I have served the Amended Appellants' Motion for Clarification of Letter
Regarding Record on Appeal on Marie Assa'ad Faltas, by depositing a copy of it in the United
States Mail, postage prepaid, on the 8th day of September, 2011, addressed to her attorney of
record:

Orin Gail Briggs, Esquire
P. O. Box 85085
Lexington, South Carolina 29073

[SIGNATURE ON FOLLOWING PAGE]

September 8, 2011



Laura Sabo, Paralegal
McAngus, Goudelock & Courie LLC
Meridian 10th Floor
1320 Main Street
PO Box 12519
Columbia, SC 29211-2519
(803) 779-2300

Attorneys for Appellants

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Court Judge

Case No. 09-CP-40-2219.

RECEIVED
SEP 08 2011
SC Court of Appeals

Marie Assa'ad-Faltas, MD, MPH,.....Respondent,

v.

Dinah Steele; Steele Enterprises and/or AAA
Investments, a business; Larry Roe; Sharon
B. Koon; Eugene W. (Buddy) Koon, Jr.;
Eugene W. (Trip) Koon, III; Evers-Koon and
or EKG of South Carolina, a business; Jane
Doe; and other unknown-named persons and
entities who injured Plaintiff,.....Defendants,

of whom

Dinah Steele and Larry Mason are the,.....Appellants.

AMENDED
APPELLANTS' MOTION FOR CLARIFICATION
OF LETTER REGARDING RECORD ON APPEAL


Pursuant to Rules 210 and 240, SCACR, Appellants Dinah Steele and Larry Mason hereby request this Court to clarify its letter dated August 22, 2011 regarding the Record on Appeal in this case. That letter requires Appellants to file their Final Brief and the Record on Appeal in this matter by September 8, 2011. In an order dated August 8, 2011 this Court dismissed Ms. Faltas' cross appeal for failure to file Respondent/Appellant's Initial Brief and Designation of Matter, which was remitted on

August 19, 2011.

As information for this Motion, Ms. Faltas filed a Respondent/Appellant's Initial Brief Initial on July 1, 2010, with an extensive list of items she wished to designate for the Record on Appeal. She filed an amended Designation of Matter on August 11, 2010, which Appellants moved to have corrected on August 27, 2010. This Court's October 10, 2010 Order struck several items from Ms. Faltas's designation but ordered Appellants to include the remaining items. Appellants request that the Court clarify whether any of the items designated by Ms. Faltas, and ordered by this Court to be included in the Record on Appeal in its October 10, 2010 Order, must be included the Record on Appeal in light of the dismissal of her cross-appeal and her failure to file an Initial Brief.

Appellants also move this Court for an extension of time in which to file the Record on Appeal and their Final Brief until this issue has been clarified.

Respectfully submitted,


J. Andrew Delaney
MCANGUS GOUDELOCK & COURIE, L.L.C.
Meridian 10th Floor
1320 Main Street
PO Box 12519
Columbia, SC 29211-2519
(803) 779-2300

*Attorney for Appellants
Dinah Steele and Larry Mason*

September 8, 2011

Exhibit G



The South Carolina Court of Appeals

TANYA A. GHE
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMNER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE (803) 255-1890
FAX (803) 734-1839
www.sccourts.org

October 21, 2011

J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire
McAngus Goudelock & Couric, LLC
P.O. Box 12519
Capitol Station
Columbia, SC 29211-2519

Re: Faltas, Marie Assa'ad v. Steele, Dinah
2010153027

Dear Counsel:

Enclosed is a copy of an Order of the Court regarding your Motion in the above case.

Please be advised the Appellants' Final Brief and Record on Appeal must be served and filed no later than November 10, 2011.

Very truly yours,

V. Claire Allen, Deputy
CLERK

TAG/laf

cc: Marie Assa'ad Faltas
Orin Gail Briggs, Esquire

RECEIVED
OCT 24 2011
BY: 20554, 09047

The South Carolina Court of Appeals

Marie Assa'ad Faltas, MD, MPH,

Respondent,

v.

Dinah Steele, Steele Enterprises and/or
AAA Investments, a business; Larry
Roe; Sharon B. Koon; Eugene W.
(Buddy) Koon, Jr.; Eugene W. (Trip)
Koon III; Evers-Koon and or EKG of
South Carolina, a business; Jane Doe;
and other unknown-named persons and
entities who injured Plaintiff,

Defendants,

of whom Dinah Steele and Larry
Mason are the,

Appellants.

The Honorable Alison Renee Lee
Richland County
Trial Court Case No. 2009-CP-40-02219

ORDER

Appellants have filed a motion for clarification, requesting this Court to clarify whether any of the items designated by Respondent must be included in the Record on Appeal in light of the dismissal of Respondent's cross-appeal and her failure to serve and file an initial respondent's brief. Appellants also requested an extension to serve and file Appellants' Final Brief and Record on Appeal.

Respondent's cross-appeal was dismissed on August 3, 2011 and the remittitur sent down on August 19, 2011. Respondent did not serve or file an initial respondent's brief with a correlating designation of matter. Accordingly, Appellants only need to include in the Record on

Appeal the matters designated by Appellants in their designation of matter. Appellants shall serve and file Appellants' Final Brief and the Record on Appeal within twenty days of the date of this order.

IT IS SO ORDERED.

Thomas E. Huff

Columbia, South Carolina

cc: J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire
Marie Assa'ad Faltas
Orin Gail Briggs, Esquire

FILED
10/21/11 *YHWA*

Exhibit H



ATTORNEYS AT LAW

Reply To
J. ANDREW DELANEY
Direct Dial: (803) 227-2313
adelaney@mgclaw.com
COLUMBIA

November 9, 2011

Via Hand Delivery
The Honorable Tanya Gee
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

SC Court of Appeals

RECEIVED
NOV 09 2011

RE: Marie Assa'ad Faltas, MD MPH v. Dinah Steele; Steele Enterprises and/or AAA Investments, a business; Larry Roe, Sharon B. Koon; Eugene W. (Buddy) Koon, Jr.; Eugene W. (Trip) Koon, III Evers-Koon and/or EKG of South Carolina, a business; Jane Doe and other unknown-named persons who injured the Plaintiff
Our File No.: 20554.09047
Civil Action No. 09-CP-40-2219
Claim No.: 7752715313
Case Tracking No.: 2010-153027

Dear Ms. Gee:

Enclosed for filing in the above-referenced matter, please find the original and 16 copies of the following:

- 1) the Record on Appeal; and
- 2) the Final Brief of Appellants Dinah Steele and Larry Mason.

Also, enclosed please find the original and one copy of the Proof of Service for the Record on Appeal and the Appellant's Final Brief. Please file these documents and return a clocked in copy to my courier.

Yours truly,

McAngus Goudelock & Courie, LLC


J. Andrew Delaney

JAD/lhs
Enclosures

The Honorable Tanya Gee
November 9, 2011
Page 2

cc: Orin Gail Briggs, Esq.
Alice Price Adams, Esq., Murphy & Grantland, P.A.
Robert A. McKenzie, Esq., McDonald, McKenzie, Rubin, Miller & Lybrand, LLP
Carol Edens, Allstate Insurance Company

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Court Judge

Case No. 09-CP-40-2219

RECEIVED
NOV 09 2011
SC Court of Appeals

Marie Assa'ad-Faltas, MD, MPH,.....Respondent,

v.

Dinah Steele; Steele Enterprises and/or AAA
Investments, a business; Larry Roe; Sharon
B. Koon; Eugene W. (Buddy) Koon, Jr.;
Eugene W. (Trip) Koon, III; Evers-Koon and
or EKG of South Carolina, a business; Jane
Doe; and other unknown-named persons and
entities who injured Plaintiff,.....Defendants,

of whom
Dinah Steele and Larry Mason are the,Appellants.

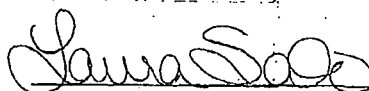
PROOF OF SERVICE

I certify that I have served: 1) the Record on Appeal; and 2) the Final Brief of Appellants
Dinah Steele and Larry Mason, on Marie Assa'ad Faltas, by depositing a copy of it in the United
States Mail, postage prepaid, on the 9th day of November, 2011, addressed to her attorney of
record:

Orin Gail Briggs, Esquire
P. O. Box 85085
Lexington, South Carolina 29073

[SIGNATURE ON FOLLOWING PAGE]

November 9, 2011



Laura Sabo, Paralegal
McAngus, Goudelock & Courie LLC
Meridian 10th Floor
1320 Main Street
PO Box 12519
Columbia, SC 29211-2519
(803) 779-2300

Attorneys for Appellants

Exhibit I



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMNER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1870
WWW.SCCOURIS.ORG

April 23, 2012

J. Andrew Delaney, Esquire
C. Edward Rawl, Jr., Esquire
McAngus Goudelock
& Courie, LLC
P.O. Box 12519
Capitol Station
Columbia, SC 29211-2519

Orin Gail Briggs, Esquire
Orin Briggs, PA
P.O. Box 85085
Lexington, SC 29073-0022

Re: Faltas, Marie Assa'ad v. Steele, Dinah

Dear Counsel:

This case will be submitted to the Court at the June 2012 term of court. No oral argument is scheduled.

Very truly yours,

V. Claire Allen

DEPUTY CLERK

RECEIVED

APR 26 2012

Per 20554.09047

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
JUL 1 0 2012
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Court Judge

Case No. 09-CP-40-2219

Marie Assa'ad-Faltas, MD, MPH,.....Respondent,

v.

Dinah Steele; Steele Enterprises and/or AAA
Investments, a business; Larry Roe; Sharon
B. Koon; Eugene W. (Buddy) Koon, Jr.;
Eugene W. (Trip) Koon, III; Evers-Koon and
or EKG of South Carolina, a business; Jane
Doe; and other unknown-named persons and
entities who injured Plaintiff,.....Defendants,

of whom
Dinah Steele and Larry Mason are the,Appellants.

PROOF OF SERVICE

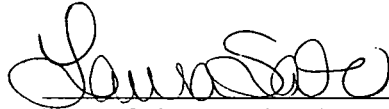
I certify that I have served **Appellants' Return in Opposition to Motion with Regard to Listed Counsel of Record for Respondent Pro Bono** on Marie Assa'ad Faltas and Orin G. Briggs, Esq., by depositing a copy of it in the United States Mail, postage prepaid, on the 10th day of July, 2012, addressed as follows:

Marie Assa'd Faltas
P.O. Box 9115
Columbia, South Carolina 29290

Orin Gail Briggs, Esquire
P. O. Box 85085
Lexington, South Carolina 29073

[SIGNATURE ON FOLLOWING PAGE]

July 10, 2012

A handwritten signature in black ink, appearing to read "Laura Sabo", written over a horizontal line.

Laura Sabo, Paralegal
McAngus, Goudelock & Courie LLC
Meridian 10th Floor
1320 Main Street
PO Box 12519
Columbia, SC 29211-2519
(803) 779-2300

Attorneys for Appellants



ATTORNEYS AT LAW

Reply To
J. ANDREW DELANEY
Direct Dial: (803) 227-2313
adelaney@mgclaw.com
COLUMBIA

July 10, 2012

RECEIVED
JUL 10 2012
SC Court of Appeals

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29211

RE: Marie Assa'ad Faltas, MD MPH v. Dinah Steele; Steele Enterprises and/or AAA Investments, a business; Larry Roe, Sharon B. Koon; Eugene W. (Buddy) Koon, Jr.; Eugene W. (Trip) Koon, III Evers-Koon and/or EKG of South Carolina, a business; Jane Doe and other unknown-named persons who injured the Plaintiff
Our File No.: 20554.09047
Civil Action No. 09-CP-40-2219
Claim No.: 7752715313
Case Tracking No.: 2010-153027

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original seven (7) copies of Appellants' Return in Opposition to Motion with Regard to Listed Counsel of Record for Respondent Pro Bono and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return the clocked-in copies via our courier.

If you have any questions, please contact me.

Yours truly,
McAngus Goudelock & Courie, LLC


J. Andrew Delaney

JAD/lhs
Enclosures

cc: Marie Assa'ad Faltas
Orin Gail Briggs, Esq.
Alice Price Adams, Esq., Murphy & Grantland, P.A.
Robert A. McKenzie, Esq., McDonald, McKenzie, Rubin, Miller & Lybrand, LLP
Carol Edens, Allstate Insurance Company