

ANDREW K. EPTING, JR., L.L.C.
ATTORNEYS AT LAW

June 23, 2014

The Honorable Daniel E. Shearouse
Supreme Court Building
1231 Gervais Street
P.O. Box 11330
Columbia, South Carolina 29211

RECEIVED

JUN 24 2014

S.C. Supreme Court

RE: Stokes-Craven Holding d/b/a Stokes Craven Ford, Appellant v. Scott L. Robinson
and Johnson McKenzie and Robinson, LLC, Respondents
Case No. 2010-CP-14-0457
Appellate Case No. 2013-001452

Dear Mr. Shearouse:

Enclosed for filing please find:

- a) 15 copies of the Record on Appeal;
- b) 16 copies of Appellant's Final Brief;
- c) 16 copies of Appellant's Final Reply Brief;
- d) Proof of Service for the Final Briefs; and
- e) Appellant's Second Amended Designation of Matter on Appeal. Appellant has amend its designation to substitute Mr. Epting's January 15, 2013 letter to the lower court for Mr. Epting's April 5, 2013 letter to the lower court as the January letter is no longer relevant to the appeal as a result of Respondents' motion to strike and was included in error. Respondents consent to the substitution as appears from the enclosed email. The April 5, 2013 letter has been included in the Record on Appeal.

I would greatly appreciate your returning one file-stamped copy of each brief to me in the self-addressed, stamped envelope provided. Thank you.

With kindest regards,

ANDREW K. EPTING, JR., LLC


Andrew K. Epting, Jr.

AKE/agg
Enclosures

cc: Susan T. Wall, Esquire
Warren C. Powell, Esquire

Andrew K. Epting, Jr. · ake@epting-law.com
Michelle N. Endemann · mne@epting-law.com
46A State Street · Charleston · South Carolina · 29401
Phone: (843) 377-1871 · Fax: (843) 377-1310

Michelle Endemann

From: Frampton, Hal [HFRampton@mcnair.net]
Sent: Tuesday, June 17, 2014 3:28 PM
To: Michelle Endemann; Wall, Susan
Cc: 'Warren Powell'; 'Ann Lee'; Harvey, Jeslyn
Subject: RE: Stokes-Craven v. Robinson - Record on Appeal

Michelle,

Thank you. Respondents consent to the substitution.

Hal

MCNAIR
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Henry W. Frampton IV
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VCard | **Bio URL** | **Web site**

From: Michelle Endemann [mailto:mne@epting-law.com]
Sent: Tuesday, June 17, 2014 3:13 PM
To: Wall, Susan
Cc: 'Warren Powell'; 'Ann Lee'; Frampton, Hal; Harvey, Jeslyn
Subject: RE: Stokes-Craven v. Robinson - Record on Appeal

Ms. Wall,

Appellant does not specifically cite to the April 5 letter. However the letter is relevant and was submitted to the lower court as required by 210(c) SCRAP. On the other hand, the January 15 letter is no longer relevant as it concerns appellant's motion for summary judgment.

Please let me know if you can consent to the substitution of the letters as the record and final briefs must be submitted to the Court on or before Monday.

Best,

Michelle

From: Wall, Susan [mailto:SWall@mcnair.net]
Sent: Tuesday, June 17, 2014 2:25 PM
To: Michelle Endemann
Cc: 'Warren Powell'; 'Ann Lee'; Frampton, Hal; Harvey, Jeslyn
Subject: RE: Stokes-Craven v. Robinson - Record on Appeal

Michelle, We cannot find where Appellant cites to the letter in either its initial brief or initial reply brief. Please direct us to the page(s) citation. Thank you.

MCNAIR
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Susan Taylor Wall

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From: Michelle Endemann [<mailto:mne@epting-law.com>]
Sent: Monday, June 16, 2014 2:45 PM
To: Michelle Endemann; Wall, Susan; 'Warren Powell'
Cc: Andrew K. Epting; Angela Gross
Subject: RE: Stokes-Craven v. Robinson - Record on Appeal

Ms. Wall and Mr. Powell,

I have not heard from either of you with regard to my request below. Please let me know if you will consent to the substitution of the April 5 letter for the January 15 letter in the Record on Appeal.

Best,

Michelle

From: Michelle Endemann
Sent: Monday, June 02, 2014 2:07 PM
To: Wall, Susan; 'Warren Powell'
Cc: Andrew K. Epting; Angela Gross
Subject: Stokes-Craven v. Robinson - Record on Appeal

Counsel,

In putting together the Record on Appeal, I discovered an error in Appellant's amended designation of matters on appeal, which was then repeated in Respondents' designation. Entry number 6 on Appellant's amended designation (and number 8 on Respondents' designation) is Drew's letter to Judge James dated January 15, 2013, concerning Stokes-Craven's motion for summary judgment. The entry should have been Drew's letter dated April 5, 2013, objecting to the proposed order granting respondents summary judgment. Copies of the two letters are attached for your convenience. Please let me know if you will consent to substitute the April 5th letter for the January 15th letter in the Record on Appeal. I apologize for the error.

Best Regards,

Michelle N. Endemann, Esq.
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