

**Allen, Linda**

---

**From:** Groves, Stephen P. <SGroves@nexsenpruet.com>  
**Sent:** Thursday, September 19, 2013 11:08 AM  
**To:** Allen, Linda  
**Cc:** gconnell@classactlaw.net  
**Subject:** Regions Bank v. Owens  
**Attachments:** Owens APPEAL Regions Bank Ltrs. Sending Return to Petition for Writ of Certiorari-c.PDF;  
Owens APPEAL Regions Bank Return to Petition for Writ of Certiorari-c.PDF

**Importance:** High

Dear Ms. Allen:

Please find attached a copy of the **Return to Petition for Writ of Certiorari** filed on behalf of the Respondent, Regions Bank, in the above-referenced appellate matter, together with a copy of the **Proof of Service**. I also attach copies of the transmittal letter (and letter to the Court of Appeals) we mailed on 9 September 2013, which contained the original and the seven copies of the **Return to Petition for Writ of Certiorari** and the **Proof of Service**. I do not have any idea where the envelope we sent may have gone.

I am reprinting the **Return to Petition for Writ of Certiorari** and the **Proof of Service** today and "resending" them to you via the Supreme Court's "Post Office Box" address. I am very sorry for the confusion and apologize for any inconvenience this may have caused.

With best regards,

*Stephen P. Groves, Sr.*

**APPELLATE, BUSINESS, & INSURANCE COVERAGE LITIGATION  
NEXSEN PRUET, LLC**

205 King Street, Suite 400 (Post Office Box 486)  
Charleston, South Carolina 29401 (Charleston, South Carolina 29402-0486)

Telephone: +1.843.720.1725 (Direct)  
+1.843.693.8973 (Cell)  
+1.843.577.9440 (Main)  
+1.800.926.6757 (Toll Free)

Telecopier: +1.843.414.8206 (Direct)  
+1.843.720.1777 (Main)

[sgroves@nexsenpruet.com](mailto:sgroves@nexsenpruet.com)

[www.nexsenpruet.com](http://www.nexsenpruet.com)

**MEMBER** - Admitted in South Carolina

**CONFIDENTIAL COMMUNICATION AND CONFIDENTIALITY NOTICE:** The information contained in this e-mail message and any attachment(s) thereto may contain legally privileged and confidential information intended only for the confidential professional, business, and/or personal use of the individual(s) or entity(ies) named above. This message is specifically covered by and protected under the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. This message is or may be an attorney-client communication and/or attorney work-product and as such is strictly privileged and confidential under applicable state and federal laws, as well as, under applicable state and federal court decisions and procedural/ethical rules. If the reader of this message is not the intended recipient(s) or an agent of the intended recipient(s) responsible for delivering this message to the intended recipient(s), YOU ARE HEREBY NOTIFIED THAT IF YOU HAVE RECEIVED THIS E-MAIL MESSAGE, NOTICE, COMMUNICATION, INFORMATION, AND/OR DOCUMENT (ATTACHMENT) IN ERROR - ANY SUBSEQUENT REVIEW, DISSEMINATION, DISTRIBUTION, AND/OR COPYING OF THIS E-MAIL MESSAGE, NOTICE, COMMUNICATION, INFORMATION, AND/OR DOCUMENT (ATTACHMENT) IS STRICTLY PROHIBITED. If you have received this communication in error, you are requested to please immediately notify the sender by telephone and/or email and return the original message to the sender, delete this e-mail message, and destroy all printed and electronic copies. Nothing in this transmission is intended either to be an electronic signature or to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

**DISCLAIMER OF KNOWLEDGE OF VIRUS, TROJAN HORSE, WORM, AND/OR OTHER ELECTRONIC DEFECT AND/OR ELECTRONIC PROBLEM:** Although this e-mail message and any attachment(s) thereto are believed to be completely free of any virus, trojan horse, worm, and/or other electronic defect which might affect and/or infect a computer system into which this e-mail and any attachment(s) is received and opened, PLEASE NOTE THAT IT IS THE DUTY, RESPONSIBILITY, AND OBLIGATION OF THE RECIPIENT OF THIS E-MAIL MESSAGE AND ANY ATTACHMENTS THERETO TO ENSURE THAT THIS E-MAIL AND ANY ATTACHMENT(S) IS VIRUS AND/OR DEFECT FREE. Neither the individual sender, Nexsen Pruet, LLC, nor their agents, employees, and/or representatives accept any responsibility, duty, and/or obligation for any loss and/or damage (whether monetary, equitable, and/or otherwise) in any way whatsoever arising in any way from the receipt, use, and/or opening of this e-mail message and any attachments thereto.

**IRS CIRCULAR 230 NOTICE:** Any federal tax advice contained in this communication (or in any attachment thereto) is not intended nor written to be used and, in turn, cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, and/or recommending any transaction or matter addressed in this communication.

\*\*\* CONFIDENTIAL COMMUNICATION \*\*\* The information contained in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

\*\*\* IRS CIRCULAR 230 NOTICE \*\*\* Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.

NEXSEN|PRUET

Stephen P. Groves, Sr.  
Member  
Admitted in South Carolina

9 September 2013

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29202

RECEIVED

SEP 19 2013

S.C. Supreme Court

Re: Regions Bank v. William S. Owens; David S. Hostetler;  
Roland G. Paddy; and Greer State Bank

Appeal from the Lexington County Court of Common Pleas  
Civil Action No.: 2009-CP-32-5373  
COA Case Tracking No.: 2011193586  
COA Case Tracking No.: 2013 \_\_\_\_\_  
NP File No.: 024340-00059

Dear Mr. Shearouse:

- Charleston
- Charlotte
- Columbia
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach

Enclosed please the original and seven copies of the Return to Petition for Writ of Certiorari submitted on behalf of the Respondent, Regions Bank, in the above-referenced appellate matter. I also enclose the original and one copy of a Proof of Service indicating service of a copy of the Return to Petition for Writ of Certiorari upon all counsel of record, as well as upon the South Carolina Court of Appeals. I would appreciate you kindly filing the Return to Petition for Writ of Certiorari and the Proof of Service with the Supreme Court and returning one stamped copy of each to my attention in the enclosed self-addressed and stamped envelope.

By copy of this letter I am sending copies of the Return to Petition for Writ of Certiorari and the Proof of Service to all counsel of record and to the South Carolina Court of Appeals.

If you need anything else or I otherwise may be of any assistance to you or the Court of Appeals regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is [sgroves@nexsenpruet.com](mailto:sgroves@nexsenpruet.com).

NEXSEN PRUET

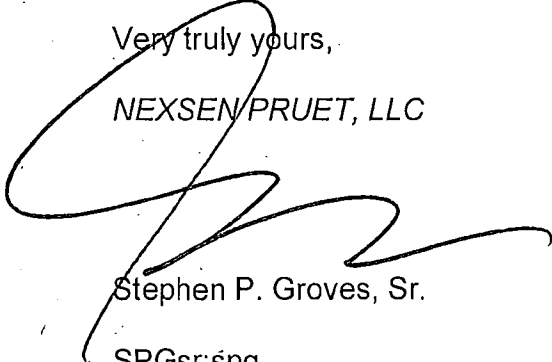
Hon. Daniel Shearouse  
Clerk of Court  
9 September 2013  
Page 2

---

With kindest regards, I remain

Very truly yours,

NEXSEN PRUET, LLC



Stephen P. Groves, Sr.

SPGsr:spg

Enclosures

CCE: Hon. Jenny Abbott Kitchings, Clerk of Court of Appeals  
Gene M. Connell, Jr., Esquire  
Cheevin T. Gardner, Esquire  
William Wesley Johnson, Jr., Esquire  
S. Brook Fowler, Esquire

NPCHAR1:1213248.1-LT-(SPG) 024340-00059

NEXSEN|PRUET

Stephen P. Groves, Sr.  
Member  
Admitted in South Carolina

9 September 2013

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court Of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

Re: Regions Bank v. William S. Owens; David S. Hostetler;  
Roland G. Paddy; and Greer State Bank  
Appeal from the Lexington County Court of Common Pleas  
Civil Action No.: 2009-CP-32-5373  
Case Tracking No.: 2011193586  
NP File No.: 024340-00059

Dear Ms. Kitchings:

Enclosed please two copies of the Return to Petition for Writ of Certiorari of the Respondent, Regions Bank, in the above-referenced appellate matter. I also enclose two copies of a Proof of Service indicating service of the Return to Petition for Writ of Certiorari upon all other counsel of record.

I would appreciate your filing one copy each of Regions Bank's Return to Petition for Writ of Certiorari and the Proof of Service, with the Court of Appeals and returning one stamped copy of each to my attention in the enclosed self-addressed stamped envelope.

If you need anything else or I otherwise may be of any assistance to you regarding this matter, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is [sgroves@nexsenpruet.com](mailto:sgroves@nexsenpruet.com).

NEXSEN PRUET

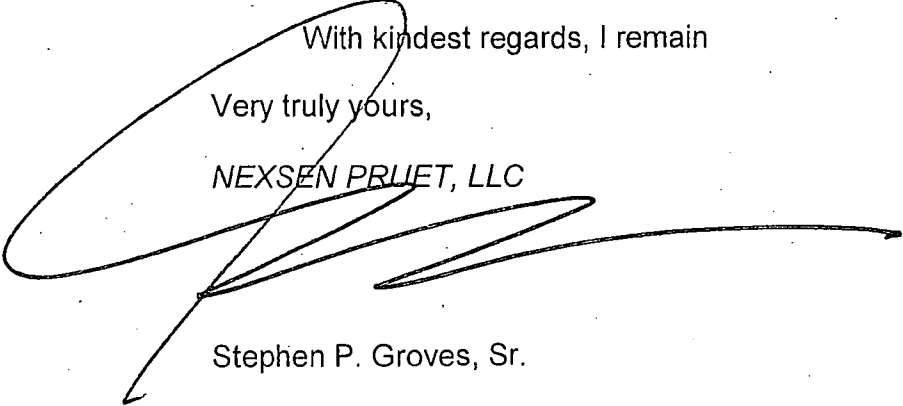
Hon. Jenny Abbott Kitchings  
Clerk of Court  
9 September 2013  
Page 2

---

With kindest regards, I remain

Very truly yours,

NEXSEN PRUET, LLC



Stephen P. Groves, Sr.

SPGsr:spg

Enclosures

CC

Hon. Daniel Shearouse, Clerk of Supreme Court  
Gene M. Connell, Jr., Esquire  
Cheevin T. Gardner, Esquire  
William Wesley Johnson, Jr., Esquire  
S. Brook Fowler, Esquire

NPCHAR1:1213260.1-LT-(SPG) 024340-00059