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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Case No. 2014-CP-32-00210

RECEIVED

AUG 08 2014

SC Court of Appeals

Matt Laughridge and Matt Laughridge for State Senate, Inc.,..... Respondents,

v.

D. Jeffrey Sewell, Appellant.

**MOTION TO DISMISS NOTICE OF APPEAL
AND FOR ATTORNEYS' FEES AND COSTS**

Respondents Matt Laughridge and Matt Laughridge for State Senate, Inc. (“Respondents”), pursuant to Rule 240, SCACR, by and through their undersigned counsel, submit the within motion to dismiss the Notice of Appeal of Appellant D. Jeffrey Sewell (“Appellant”) and for the award of attorneys’ fees and costs associated with bringing this motion. In support of this motion, Respondents would respectfully show unto this Court as follows:

(1) The case below arises from Respondents’ claims that Appellant unlawfully converted and appropriated the websites and internet accounts associated with Respondents’ campaign for State Senate District 14 in the state of Georgia (“Campaign”)

and Appellant's posting of unauthorized, harassing, malicious, threatening, and defamatory statements against Respondents on said Campaign websites and accounts.

(2) On January 21, 2014, the circuit court granted Respondents' Motion for Temporary Restraining Order and scheduled a hearing on Respondents' Motion for Temporary Injunction on January 31, 2014.

(3) On January 30, 2014, Appellant notified the circuit court via email that he would be unable to attend on account of health-related issues and consenting to an extension of the Temporary Restraining Order ("TRO") until March 6, 2014. Upon motion of Appellant and consent of Respondents, the court on March 6, 2014, subsequently extended the TRO until further order of the court.

(4) On February 23, 2014, counsel for Respondents served upon Appellant a Notice of Taking Deposition (*Duces Tecum*). Therein, Respondents required Appellant to attend a deposition on March 5, 2014, and to bring and produce certain documents identified therein.

(5) On March 3, 2014, Appellant advised Respondents that he was unavailable for a deposition on the requested date and asked Respondents to submit optional dates of availability from March 11 to 14, 2014.

(6) The parties subsequently agreed to reschedule the deposition for March 13, 2014. Relying upon the agreement of the parties, counsel for Respondents prepared for the deposition and secured a court reporter, incurring necessary costs and expenses in the process.

(7) By email sent on the morning of the scheduled deposition at 1:48 a.m., March 13, 2014, Appellant notified counsel for Respondents that he would not attend any deposition requested by Respondents.

(8) In accordance with the prior agreement of the parties, counsel for Respondents convened the deposition at the appointed time; however, Appellant was not in attendance.

(9) On March 31, 2014, counsel for Respondents communicated with Appellant for the purposes of rescheduling the deposition and in an effort to resolve this matter informally. Appellant failed to respond to Respondents' requests.

(10) Respondents filed a Motion to Compel Deposition and Production and for Costs against Defendants on April 11, 2014.

(11) On or about April 1, 2014, Respondents also served on Appellant interrogatories and requests for production. Responses to these discovery requests were due no later than May 6, 2014.

(12) Appellant failed to provide responses to Respondents' discovery requests and, on May 12, 2014, Respondents filed a Motion to Compel Discovery Responses and for Costs.

(13) The circuit court scheduled a hearing on Respondents motions to compel for June 18, 2014. On June 17, 2014, Appellant advised the circuit court of a death in his family and requested a continuance. Although Appellant's request was granted, the circuit court ordered that "[n]o further continuances shall be granted for any reason" owing to Appellant's "history of requesting continuances at the last minute." *See* Exhibit A, Order dated June 18, 2014.

(14) The Honorable William P. Keesley held a hearing on Respondents' motions to compel on July 7, 2014. On that same date, the court issued an order granting Respondents' motions, requiring Appellant to submit to a deposition and respond to outstanding discovery requests, and imposing sanctions against Appellant "for attorneys' fees and costs needlessly caused by the defendants' refusals to cooperate with discovery." *See* Exhibit B, Order dated July 7, 2014 ("Order").

(15) In accordance with the Order, Respondents served a renewed notice of deposition to Appellant on July 23, 2014, scheduling Appellant's deposition for August 4, 2014.

(16) On July 31, 2014, Appellant provided Respondents with a Notice of Appeal of the Order, which was filed with the Lexington County Clerk of Court on August 1, 2014, and with the South Carolina Supreme Court on August 4, 2014. *See* Exhibit C, Notice of Appeal.

(17) By Order dated August 4, 2014, the South Carolina Supreme Court transferred the appeal to the Court of Appeals pursuant to Rule 204(a) of the South Carolina Appellate Court Rules. *See* Exhibit D, Order dated August 4, 2014.

(18) Because the Order addresses discovery matters, it is not immediately appealable. "As a general rule, only final judgments are appealable." *Culbertson v. Clemens*, 322 S.C. 20, 23, 471 S.E.2d 163, 164 (1996). "[A]n order denying or compelling pretrial discovery is not directly appealable since it is an intermediate or interlocutory decision." *Ex parte Wilson*, 367 S.C. 7, 13, 625 S.E.2d 205, 208 (2005). *See also Patterson v. Spector Broad. Corp.*, 287 S.C. 249, 335 S.E.2d 803 (1985) (holding that orders compelling discovery are interlocutory and not directly appealable);

S.C. Code Ann. § 14-3-330(1) and (2) (restricting appellate review of interlocutory orders); *Wallace v. Interamerican Trust Co.*, 246 S.C. 563, 568, 144 S.E.2d 813, 816 (1965) (holding that an order granting the right to inspect documents is not immediately appealable as it does not involve the merits or affects any substantial right).

(19) Accordingly, the Appeal should be dismissed and should not operate to stay the Order or the discovery matters addressed therein. *See* Rule 241(a), SCACR. Furthermore, Appellant should be instructed to comply with the Order and Respondents should be awarded attorneys' fees and costs associated with bringing this motion.

WHEREFORE, having fully set forth their motion, Respondents move the Court to issue an order (1) concluding that the Order is not immediately appealable; (2) dismissing the Appeal; (3) finding that the Appeal does not operate to stay the Order; (4) instructing Appellant to comply with the Order; (5) awarding Respondents attorneys' fees and costs associated with bringing this motion; (6) and for such other and further relief as is just and proper.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

By: 

Mitchell Willoughby, Esquire
Benjamin P. Mustian, Esquire
Andrew J. D'Antoni, Esquire
WILLOUGHBY & HOEFER, P.A.
Post Office Box 8416
Columbia, South Carolina 29202
Telephone Number: 803-252-3300
mwilloughby@willoughbyhoefer.com
bmustian@willoughbyhoefer.com
adantoni@willoughbyhoefer.com

and

Charlie Condon, Esquire
CHARLIE CONDON LAW FIRM, LLC
880 Johnnie Dodds Blvd., Suite 1
Mount Pleasant, South Carolina 29464
Telephone Number: 843-884-8146
charlie@charliecondon.com

Attorneys for Plaintiffs

This 8th day of August, 2014
Columbia, South Carolina

EXHIBIT A

ORIGINAL

STATE OF SOUTH CAROLINA
 COUNTY OF LEXINGTON
 IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
 CASE NUMBER 2014CP3200210

JUN 18 PM 12:56

Matt Laughridge	Matt Laughridge for State Senate Inc. <small>WITH A. CARRIGG CLERK OF COURT LEXINGTON SC</small>	Sewell Consultancy llc	D Jeffrey Sewell
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PLAINTIFF(S)

DEFENDANT(S)

Submitted by:	Attorney for: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Self-Represented Litigant
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DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit);
 Rule 43(k), SCRPC (Settled); Other: _____
- ACTION STRICKEN (CHECK REASON):** Rule 40(j) SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other: _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded; Other:

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

Defendant filed an emergency request for a continuance via email in regards to his hearing scheduled on for June 18, 2014 @930am. No further continuances shall be granted for any reason. Defendant has history of requesting continuances at the last minute.

This order ends does not end the case.

Additional Information for the Clerk: _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. **Note: Title abstractors and researchers should refer to the official court order for judgment details.**


Circuit Court Judge

2168
Judge Code

6/18/2014

Date

For Clerk of Court Office Use Only

This judgment was entered on , and a copy mailed first class or placed in the appropriate attorney's box on 19th of June 2014, to attorneys of record or to parties (when appearing pro se) as follows:

Mitchell Willoughby PO Box 8416 Columbia, SC 29202-8416
Benjamin Parker Mustian PO Box 8416 Columbia, SC 29202-8416

D Jeffrey Sewell 100 Sunset Blvd. Suite 203 West Columbia, SC 29169

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Beth A. Carrigg /mh

Court Reporter

Beth A. Carrigg - Clerk of Court

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

EXHIBIT B

JUL172014

FILED

ORIGINAL

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF LEXINGTON) 2014 JUN -7 AM 11:53 Case Number 2014CP3200210

ETHE A. CARRIG
CLERK OF COURT

MATT LAUGHRIDGE and MATT TINGTON SC
LAURIDGE FOR STATE SENATE, INC.,)

Plaintiffs,)

vs.)

SEWELL CONSULTANCY, LLC, and)
D. JEFFREY SEWELL, INDIVIDUALLY,)

Defendants.)

ORDER
RE: MOTION TO COMPEL

The issues before the court relate to discovery. The court grants the plaintiffs' motions and directs the defendant, Mr. D. Jeffrey Sewell, to submit to a deposition and to respond to outstanding discovery requests. The court imposes a sanction against Mr. Sewell and the LLC in the amount of \$3,500 for attorneys' fees and costs needlessly caused by the defendants' refusals to cooperate with discovery.

WPK
#1

Mr. Sewell is representing himself. He understands that the LLC must have a licensed attorney to appear in circuit court. Despite sufficient opportunity to obtain counsel, that has not been done. So, the LLC did not appear for the hearing.

The plaintiffs scheduled a deposition of Mr. Sewell. He requested and received the rescheduling of that deposition, and he agreed to appear in Richland County at the office of the attorneys for the plaintiffs. Mr. Sewell lives in West Columbia. The office of the plaintiffs' attorneys is in downtown Columbia, no more than a few miles away. As the date approached for the rescheduled deposition, Mr. Sewell contacted the plaintiffs'

attorneys and stated that he would not appear. He was told that the deposition would be convened at the previously-agreed-upon date, time, and place. He did not appear.

At the hearing today, Mr. Sewell argued that the deposition is premature, but provided no specifics, other than to cite Rule 30, SCRPC. The court finds nothing premature about the scheduling of the deposition.

He also cited the fact that he has not been paid, presumably the \$25 plus mileage required for a witness under Rule 30. It is the court's belief that Mr. Sewell misunderstands the distinction between a party and a witness under that rule. The objection on that ground is denied.

Mr. Sewell challenges the location of the scheduled deposition. He argues that he is a resident of Lexington County and cannot be compelled to attend a deposition in Richland County. He has not raised this objection previously. He agreed to the deposition being held at the office in Richland, and he lives nearby in West Columbia. His *WPC* *#2* *WPC* objection on this ground is denied.

The court sets the deposition to be held at the office of the plaintiffs' attorneys and orders that Mr. Sewell appear and meaningfully participate in the deposition. The plaintiffs' attorneys are directed to provide Mr. Sewell with notice of at least 10 days, and he must appear and participate on the designated date and time, unless he is relieved of the obligation by order of the Court based on a properly filed motion, or unless the plaintiffs' attorneys consent to the rescheduling. In the event of such rescheduling, he must appear at the rescheduled date and time, and the agreement for rescheduling must be documented by writing or email.

Plaintiffs' counsel also argues that the defendants have not responded to Interrogatories and Requests to Produce. Mr. Sewell filed an objection, but made no argument in opposition to the position that he has failed to respond at all to the written discovery requests. The court finds no basis for refusing to comply with discovery in this regard. Mr. Sewell [and the LLC (through appropriate counsel)] are ordered to provide meaningful discovery responses within 30 days of the date that a copy of this order is mailed by the Clerk of Court's office.

As for sanctions, it has been clearly demonstrated that the defendants are unreasonably and improperly refusing to participate in discovery. Plaintiffs' counsel has provided the court with an affidavit seeking \$11,547.50 in attorneys' fees, \$83.30 for expenses related to the deposition, and \$50 for costs related to the motion. The court has considered the relevant factors related to attorneys' fees and sanctions. The affidavit reflects that Mitchell Willoughby, Esquire, is a senior shareholder, billing at \$450 per hour, and that he spent 1.2 hours in dealing with the motion related to the deposition. It states that Benjamin P. Mustain, Esquire, is a shareholder, who bills at \$350 per hour, and has expended 29.2 hours on these matters. The affidavit also states that Andrew J. D'Antoni, Esquire, is an attorney who bills at \$250 per hour, and has spent 3.5 hours related to the issues before the court.

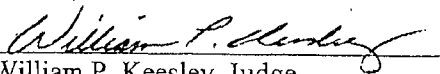
The court was not provided specifics as to how the hours are broken down. In the court's view, there has not been a sufficient showing that 33.9 billable hours were required to deal with rescheduling and seeking to compel, nor has there been a showing that the top billable rate was required. Having reviewed the file, the court accepts that this matter has involved repeated scheduling issues needlessly caused by the defendants'

WPA
#3

refusal to comply. Considering the factors, including the time necessary expended, the customary and prevailing fees, the results achieved, the difficulty of the issues, and the professional standing of counsel, the court finds that it has been established that a minimum of 10 billable hours were unnecessarily incurred due to the defendants' wrongful refusal to comply with discovery, and that Mr. Mustain is the attorney who primarily would be dealing with this matter. His hourly rate is appropriate for dealing with matters of this nature. Therefore, the court awards \$3,500 in sanctions for attorneys' fees, finding that amount to be reasonable to award under these circumstances. In addition, the court awards \$83.30 in expenses and \$50 in costs that were required as a result of the defendants' unjustified non-compliance.

AND IT IS SO ORDERED.

#4
July 7, 2014


William P. Keesley, Judge

JUL172014

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF LEXINGTON
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE
CASE NUMBER 2014CP3200210

Matt Laughridge	Matt Laughridge for State Senate Inc	Sewell Consultancy llc	D Jeffrey Sewell
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PLAINTIFF(S)

DEFENDANT(S)

Submitted by:	Attorney for: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Self-Represented Litigant
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DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit);
 Rule 43(k), SCRPC (Settled); Other: _____
- ACTION STRICKEN (CHECK REASON):** Rule 40(j) SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other: _____
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded; Other:

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk: _____

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk. Note: Title abstractors and researchers should refer to the official court order for judgment details.

Circuit Court Judge	Judge Code	Date
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7/16/2014

JUL172014

For Clerk of Court Office Use Only

This judgment was entered on 17th of July 2014, and a copy mailed first class or placed in the appropriate attorney's box on 17th of July 2014, to attorneys of record or to parties (when appearing pro se) as follows:

Mitchell Willoughby
PO Box 8416 Columbia, SC 29202-8416
Benjamin Parker Mustian
PO Box 8416 Columbia, SC 29202-8416

D Jeffrey Sewell
100 Sunset Blvd. Suite 203 West Columbia, SC 29169

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

Beth A. Carrigg/mh

Court Reporter

Beth A. Carrigg - Clerk of Court

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

EXHIBIT C

COPY

STATE OF SOUTH CAROLINA)
)
 COUNTY OF LEXINGTON)
)
 Matt Laughridge and Matt)
 Laughridge for State Senate, Inc.,)
)
 Plaintiffs,)
)
 v.)
)
 Sewell Consultancy, LLC, and)
 D. Jeffrey Sewell, individually,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 FOR THE 11TH JUDICIAL CIRCUIT
 CASE NO.: 2014CP3200210

NOTICE OF APPEAL

2014 AUG - 1 P 2:35
 FILED
 BETH A. CARRIGG
 CLERK OF COURT
 LEXINGTON SC

NOTICE OF APPEAL

Notice is hereby given that Defendant D. Jeffrey Sewell *pro se* in the above-captioned case hereby appeals the decision to the South Carolina Court of Appeals from the Court of Common Pleas regarding the Order Re: Motion to Compel issued by Judge William P. Keesley for the 11TH Judicial Circuit entered on July 7, 2014.

RESPECTFULLY SUBMITTED



This 31st day of July, 2014.

By:

 D. Jeffrey Sewell, *Pro Se*
 100 Sunset Boulevard, Suite 203
 West Columbia, SC 29169
 (803) 318-3000

COPY

CERTIFICATE OF SERVICE

I, D. Jeffrey Sewell, *Pro Se*, do hereby certify that the foregoing Notice of Appeal has this day been served on the following person(s) by either mail, fax or electronic transfer a true and correct copy, as follows:

Mitchell Willoughby
PO Box 8416, Columbia, SC 29202-8416

Benjamin Parker Mustian
PO-Box 8416, Columbia, SC 29202-8416

This 31st day of July, 2014.



By:

D. Jeffrey Sewell, *Pro Se*
100 Sunset Boulevard, Suite 203
West Columbia, SC 29169
(803) 318-3000

BETH A. CARRIGG
CLERK OF COURT
LEXINGTON SC

2014 AUG - 1 P 2:35

FILED

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

AUG -4 2014

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

S.C. Supreme Court

Honorable William P. Keesley

Case No.: 2014-CP-32-02210

Matt Laughridge, Respondent,
Matt Laughridge for State Senate, Inc., Respondent,

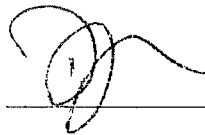
v.

D. Jeffrey Sewell, Appellant.

NOTICE OF APPEAL

D. Jeffrey Sewell appeals the order of the Honorable William P. Keesley., dated July 7, 2014. Appellant received written notice of entry of this notice on July 24, 2014.

Submitted by:
August 4, 2014



D. Jeffrey Sewell, *Pro Se* Appellant

100 Sunset Boulevard
Suite 203
West Columbia, SC 29169
(803) 318-3000

CERTIFICATE OF SERVICE

I, D. Jeffrey Sewell, *Pro Se*, do hereby certify that the foregoing **Notice of Appeal** has this day August 4th, 2014 have been served on the following person(s) by either mail, fax or electronic transfer a true and correct copy, as follows:

Documents served: NOTICE OF APPEAL

Parties Served:

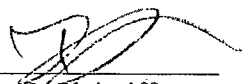
Mitchell Willoughby
PO Box 8416, Columbia, SC 29202-8416
MWilloughby@Willoughbyhoefer.com

Benjamin Parker Mustian
PO Box 8416, Columbia, SC 29202-8416
BMustian@Willoughbyhoefer.com

RECEIVED

AUG - 4 2014

S.C. Supreme Court



D. Jeffrey Sewell, *Pro Se* Plaintiff
100 Sunset Boulevard
Suite 183
Columbia, SC 29169
(803) 318-3000

EXHIBIT D

The Supreme Court of South Carolina

Matt Laughridge v. Sewell Consultancy

Appellate Case No. 2014-001660

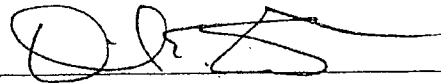
The Honorable The Honorable William P. Keesley
Lexington County
Trial Court Case No. 2014CP3200210

ORDER

Pursuant to Rule 204(a) of the South Carolina Appellate Court Rules, this appeal is hereby transferred to the South Carolina Court of Appeals.

FOR THE COURT

BY



CLERK

Columbia, South Carolina
August 4, 2014

cc: D. Jeffrey Sewell
Mitchell Willoughby, Esquire
Benjamin Parker Mustian, Esquire

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Case No. 2014-CP-32-00210

RECEIVED

AUG 08 2014

SC Court of Appeals

Matt Laughridge and Matt Laughridge for State Senate, Inc.,..... Respondents,

v.

D. Jeffrey Sewell,..... Appellant.

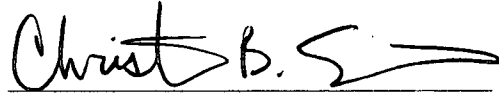
CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one (1) copy of Respondents' (1) **Letter to the Honorable Jenny Abbott Kitchings dated August 8, 2014;** and (2) **Respondents' Motion To Dismiss Notice Of Appeal And For Attorneys' Fees And Costs** on behalf of Matt Laughridge and Matt Laughridge for State Senate, Inc. by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Sewell Consultancy, LLC
C/O D. Jeffrey Sewell
100 Sunset Boulevard, Suite 203
West Columbia, SC 29169

(cont'd)

Jeffrey Sewell
100 Sunset Boulevard, Suite 203
West Columbia, SC 29169

A handwritten signature in black ink, appearing to read "Christine B. Severin". The signature is written in a cursive style with a long horizontal flourish at the end.

Christine B. Severin
Columbia, South Carolina

This 8th day of August, 2014.

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

930 RICHLAND STREET

P.O. BOX 8416

COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
RANDOLPH R. LOWELL**
TRACEY C. GREEN
BENJAMIN P. MUSTIAN**
ELIZABETH ZECK*
ELIZABETHANN LOADHOLT CARROLL
CHAD N. JOHNSTON
JOHN W. ROBERTS
ANDREW J. D'ANTONI

AREA CODE 803
TELEPHONE 252-3300
TELECOPIER 256-8062

August 8, 2014

RECEIVED
'AUG 08 2014
SC Court of Appeals

*ALSO ADMITTED IN TX
**ALSO ADMITTED IN THE DISTRICT OF COLUMBIA

VIA HAND DELIVERY

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

RE: *Laughridge v. Sewell*, Civil Action No. 2014-CP-32-00210

Dear Ms. Kitchings:

On behalf of Respondents Matt Laughridge and Matt Laughridge for State Senate, Inc. ("Respondents"), enclosed please find the original and six (6) copies of Respondents' **Motion To Dismiss Notice Of Appeal And For Attorneys' Fees And Costs** along with a check in the amount of twenty-five dollars (\$25.00) representing the requisite filing fee for this motion. Also enclosed is a certificate of service reflecting service upon Appellant D. Jeffrey Sewell.

I would appreciate your acknowledging receipt of this letter and the attached document by file stamping the two (2) extra copies of the letter enclosed and returning them to me via our courier.

If you have any questions, or require additional information, please do not hesitate to contact me. With best regards, I am,

Respectfully,

WILLOUGHBY & HOEFER, P.A.



Benjamin P. Mustian

(Continued . . .)

Honorable Jenny Abbott Kitchings
August 8, 2014
Page 2

BPM/cbs
Enclosures

cc: D. Jeffrey Sewell
Sewell Consultancy, LLC (*c/o* D. Jeffrey Sewell)