

June 19, 2012

V. Elizabeth Wright
COVINGTON, PATRICK, HAGINS,
STERN, & LEWIS, P.A.
PO BOX 2343
Greenville, SC 29602

Re: *J. Scott Kunst v. David Loree, C.A No.: 2006-CP-39-1826, 2011199507*

Dear Elizabeth Wright,

I have received your motion to Compel Production of the Completed Record on Appeal dated May 31, 2012. In your motion you state that (in the May 7 Record) "once again a document listed in Loree's Designation was not included." This May 7, 2012 Record was the final and the first draft with page numbers. What is obvious to anyone is that the September 20, 2010 Transcript you stated was "missing" WAS there all along and occurred on Page 290 rather than Page 283. Your motion also neglected to mention that an earlier draft was sent to you to avoid such a problem and you apparently missed it there as well. My letter dated May 25, 2012 was clear.

It appears that you are asking for a new copy of all three hundred pages identical to the May 7, 2012 Record but with the index with the corrected "290" page number attached be served upon your client as a complete package. I understand that much. You are basically requesting that I again copy all 300 pages and serve them again because you don't want to attach the corrected index page. I understand that as well. Please note that the corrected index page would have been served on the court later when due. This was your served copy for your final briefs.

This was a rather elaborate motion for a deep pocket client. I have not heard from the court regarding new due dates as of this writing, nonetheless, I want to get you what you need sooner than later. Because the cost of these copies is unnecessarily cost prohibitive for me, I want to be absolutely certain the Record is precisely as you need before I serve it again.

Now that I must assume that every page, especially those pages designated by you, were not reviewed page by page in the May 7th Record, I have a new concern. I brought up a concern regarding the size of your designation #12 to you at the time of the first draft. This begins on page #53 of the May 7th Record. Before I incur the cost of copying all 300 pages again, please go to page 66 of the May 7, 2012 record (your Exhibit 2) and confirm that all 133 pages of transcript included there was indeed what was in the originally filed Memorandum. I am concerned that my copy of the memorandum was incorrect and had been compromised during my own research back in 2008. I had assumed that you had looked at this and confirm its accuracy. Please confirm that Exhibit 2 as it appears in the May 7, 2012 record is what was filed in Pickens on January 10, 2008. I am also sending someone to Pickens to check the file.

Thank you for your assistance.

Sincerely,



J. Scott Kunst,

RECEIVED

JUN 25 2012

SC Court of Appeals

(C) Tanya A. Gee, South Carolina Court of Appeals

130 Arabian Way, Simpsonville, SC 29681 864 979 7961 StudioKunstwerke@aol.com