

JESSICA A. WALLER
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Gallivan, White & Boyd, P.A.
—ATTORNEYS AT LAW—

REPLY TO: Columbia Office
1201 Main Street, Suite 1200 (29201)
Post Office Box 7368
Columbia, SC 29202-7368
803.779.1833 - TEL
803.779.1767 - FAX
www.gwblawfirm.com

February 24, 2016

VIA HAND-DELIVERY

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

RECEIVED

FEB 24 2016

SC Court of Appeals

Re: *Charles Taylor, Appellant v. Stop 'N' Save, Inc., d/b/a El Cheapo Plus #7 and Roy Rahal, Respondents*
Appellate Case No.: 2015-002481
GWB File No.: 8566-1

Dear Ms. Kitchings:

This letter is to supplement our correspondence to the Court dated February 19, 2016. As such, please find enclosed two copies each of the following:

1. Charles Taylor's correspondence to Gray Culbreath dated February 20, 2016 regarding Respondents' Designation of Matter.
2. Charles Taylor's email correspondence to Jessica Waller dated February 24, 2016 regarding Respondents' Designation of Matter.
3. Jessica Waller's correspondence to Charles Taylor dated February 24, 2016 regarding Respondents' Designation of Matter and enclosing, via Federal Express, a copy of each item designated by Respondents to be included in the record on appeal.
4. Email to Charles Taylor sending February 24, 2016 correspondence.

Please file one copy of each and return a filed copy of each to me via our office courier.

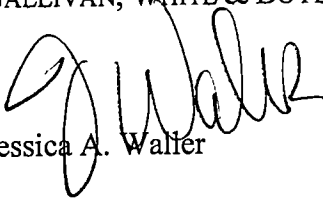
Thank you for your assistance in this matter, and please contact me if you have any questions.

The Honorable Jenny Abbott Kitchings
February 24, 2016
Page 2

With kind regards, I am

Very truly yours,

GALLIVAN, WHITE & BOYD, P.A.

A handwritten signature in black ink, appearing to read "J. Waller". The signature is fluid and cursive, with a large initial "J" and "W".

Jessica A. Waller

JAW/ct

Enclosures

cc: Charles E. Taylor
332 Myrtle Beach Hwy.
Sumter, SC 29153

February 20, 2016

Gray T. Culbreath, Esq. of
Gallivan, White & Boyd, P.A.
Defense's Lead Counsel
Post Office Box 7368
Columbia, SC. 29202

RECEIVED

FEB 24 2016

SC Court of Appeals

RE: Charles Taylor, Appellant

vs.

Stop "N" Save, Inc., d/b/a, El Cheapo Plus #7 and Roy Rahal, Respondents

C/A No: 2015-002481

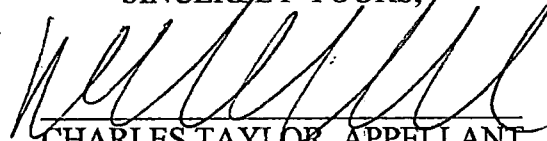
Dear Mr. Culbreath:

So that there are no confusions and delay in preparing the Record on Appeal, and no misunderstandings as to what you want included therein, once again, I ask that you provide me with 1 copy of each page you want included and I will do the rest. I have cancer et. al., etc., as you well know from this case. I need your copies by Wednesday Feb. 24, 2016, so that I can get the ROA served to you on time and later filed to the court when all final briefs will be due. In the foregoing regards, I ask your cooperation. Again, if I don't received your copies by then. I will include only what I have and can find from what I actually received from you. Thus you are on notice for the 2nd time. You knows better than anyone the exact page by page you want included.

Also, I ask that you state the total number of pages you are sending and provide the clerk of court with a copy of each page & the total number you're sending me. This is to prevent a later dispute, to cause ROA delay, claiming what was sent & what was not included in the Record on Appeal.

I'm trying to prevent problems before they occur causing unnecessary later arguments and motions. Please send copies bearing the court's clocked in stamp date & time to show what you filed & when.

SINCERELY YOURS,



CHARLES TAYLOR, APPELLANT
332 MYRTLE BEACH HIGHWAY
SUMTER SOUTH CAROLINA 29153
(803) 609-7990

Cc: Clerk of Court SC Court of Appeals
Please clock & return extra copy in the SASE
Cc: Office of SC Court Administration

Christle Turner

From: ugcards@aol.com
Sent: Wednesday, February 24, 2016 10:28 AM
To: Jessica Waller
Subject: found all items except few

Hello Mrs. Walker:

RE: Appellate Case No: 2015-002481 and your file no: 8566-1:

Jessica, I found the items you listed on your DM to be included in the Record on Appeal, except a few, which I am putting in a letter today to you, so that I can copy the court file, so anyone can later see the resolution of the matter, hopeful for good, so I can get on with preparing the record to serve to you on time, etc. I spent days & nights rumbling through piles and piles to find such.

I may still need to motion for extended time to complete the record because there are so many pages, given my conditions, but i will deal with that as the need becomes clearer.

Thanks, Mrs. Walker!

Charles Taylor

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FEB 24 2016
SC Court of Appeals

JESSICA A. WALLER
Direct Dial: 803.724.1722
jwaller@gwblawfirm.com



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February 24, 2016

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FEB 24 2016

SC Court of Appeals

VIA EMAIL: ugcards@aol.com AND FEDERAL EXPRESS

Charles E. Taylor
332 Myrtle Beach Hwy.
Sumter, SC 29153

Re: *Charles Taylor, Appellant v. Stop 'N' Save, Inc., d/b/a El Cheapo Plus #7 and Roy Rahal, Respondents*
Appellate Case No.: 2015-002481
GWB File No.: 8566-1

Dear Mr. Taylor:

Yesterday, I received your correspondence dated February 20, 2016, in which you again demanded a copy of each item designated by Respondents to be included in the record on appeal. I am also in receipt of your email correspondence sent earlier today, February 24, indicating that in fact, you are in possession of most of the items included in Respondents' designation of matter.

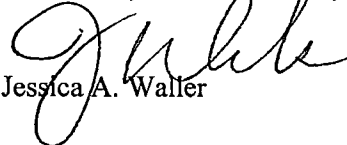
As I stated in my previous correspondence to you, the rules do not require us to provide this documentation to you, but as a courtesy and in effort to facilitate the efficient resolution of this appeal, we are doing so. Enclosed you will find a copy of every item we have designated to be included in the record on appeal. It totals 1,072 pages. This should alleviate any need for you to seek an extension to file the record on appeal.

By copy of this letter, I am notifying the court of appeals of the documentation sent to you.

With kind regards, I am

Very truly yours,

GALLIVAN, WHITE & BOYD, P.A.


Jessica A. Waller

JAW/ct

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

Christle Turner

From: Christle Turner
Sent: Wednesday, February 24, 2016 2:55 PM
To: 'ugcards@aol.com'
Cc: Jessica Waller; James Brogdon; Gray Culbreath
Subject: RE: Taylor v. Stop 'N' Save, Inc., et al.
Attachments: Ltr to Taylor re copies of items designated by Respondents.pdf

Please find attached correspondence from Jessica Waller in this matter. Please note that hard copies of the letter and documents are being sent to you via Federal Express today. If you have any questions, please do not hesitate to contact us.



Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW

Christle Turner
Legal Assistant
cturner@gwblawfirm.com

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FEB 24 2016

SC Court of Appeals