

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

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MAY 09 2016

Robin B. Stilwell, Circuit Court Judge SC Court of Appeals

Case No. 2006-CP-39-1826

J. Scott Kunst .....Respondent,

v.

David Loree .....Appellant.

**RESPONSE TO MOTION TO COMPEL**

V. Elizabeth Wright (SC Bar ID 76029)  
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*Attorneys for the Appellants*

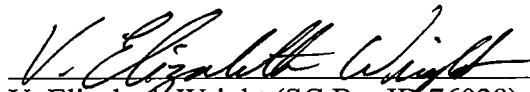
Other counsel of record:

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(864) 979-7961

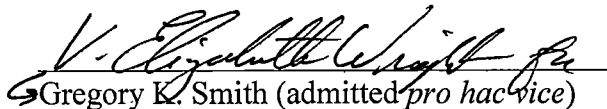
Respondent

Counsel for Appellant David Loree has further reviewed Defense Exhibit 25 in the Record on Appeal and has concluded that the correct exhibit is the Court of Appeals opinion in *Kunst v. Loree*, Opinion 5163, filed August 14, 2013. Counsel for Appellant will file the Supplement to the Record and Appendix on or before May 16, 2016, unless the Court orders otherwise.

Respectfully submitted.



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*Attorneys for the Appellants*

Greenville, South Carolina

May 6, 2016

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Robin B. Stilwell, Circuit Court Judge

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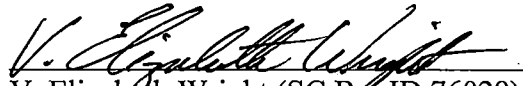
David Loree .....Appellant,

v.

J. Scott Kunst .....Respondent.

**PROOF OF SERVICE**

I certify that I have served the **Response to the Motion to Compel** on *pro se* Respondent at his last-known address of 130 Arabian Way, Simpsonville, SC 29681, by depositing it into the U.S. Mail, first class postage prepaid on May 6, 2016.



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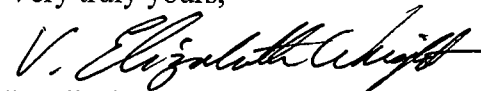
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: J. Scott Kunst v. David Loree**  
**Civil Action Number 2006-CP-39-1826**

Dear Ms. Kitchings:

In this box you will find the original and 7 copies of the Response to Motion to Compel. A clocked-in copy of the Response may be returned to me in the enclosed self-addressed, stamped envelope. By copy of this correspondence I am serving the *pro se* Respondent.

Very truly yours,



V. Elizabeth Wright

BW  
Enclosures

cc. J. Scott Kunst, *pro se*  
Gregory K. Smith, Esq. (email only)

