

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2016-001266

PERSONAL CARE, INC.,

Appellant,

vs.

Jerry N. Theos; URICCHIO, HOWE, KRELL,
JOHNSON, TOPOREK THEOS & KEITH, PA;
Cheryl D. Shoun; and TAYLOR, SHOUN,
BOWLEY & BYRD, LLC,

RECEIVED

JUN 14 2017

SC Court of Appeals

Respondents.

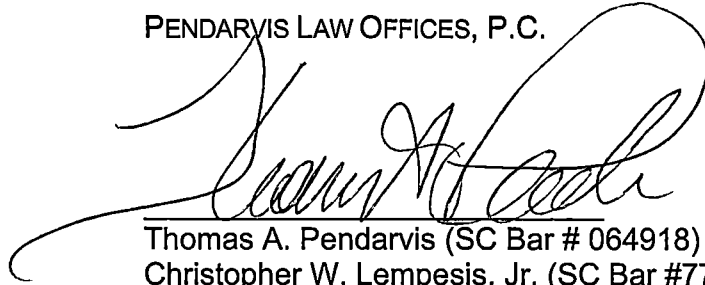
APPELLANT'S CERTIFICATE OF COMPLIANCE

I, Thomas A. Pendarvis, J.D., counsel for Appellant, hereby certify pursuant to Rule 211(b), SCACR, that BRIEF OF APPELLANT; REPLY BRIEF OF APPELLANT TO INITIAL BRIEF OF RESPONDENTS CHERYL D. SHOUN AND TAYLOR, SHOUN, BOWLEY & BYRD, LLC; REPLY BRIEF OF APPELLANT TO SUPPLEMENTAL BRIEF OF RESPONDENTS JERRY N. THEOS AND URICCHIO, HOWE, KRELL, JOHNSON, TOPOREK, THEOS & KEITH, P.A.; and RECORD ON APPEAL comply with both the Supreme Court's Order dated August 13, 2007, and Rule 211(b), SCACR. Pursuant to Rule 210(g), SCACR,

Counsel certifies that the RECORD ON APPEAL contains all material proposed to be included by any of the parties and not any other material.

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.

A handwritten signature in black ink, appearing to read "Thomas A. Pendarvis", is written over a horizontal line. The signature is fluid and cursive.

Thomas A. Pendarvis (SC Bar # 064918)
Christopher W. Lempesis, Jr. (SC Bar #77012)
710 Boundary Street, Suite 1-A
Beaufort, SC 29902
843.524.9500 Tel.
Thomas@PendarvisLaw.com
Chris@PendarvisLaw.com

Counsel for PERSONAL CARE, INC.

Beaufort, South Carolina

June 13, 2017

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2016-001266

RECEIVED

JUN 14 2017

SC Court of Appeals

Personal Care, Inc.,

Appellant,

vs.

Jerry N. Theos; URICCHIO, HOWE, KRELL,
JOHNSON, TOPOREK THEOS & KEITH, PA;
Cheryl D. Shoun; and TAYLOR, SHOUN,
BOWLEY & BYRD, LLC,

Respondents.

PROOF OF SERVICE

I, Thomas A. Pendarvis, a lawyer with PENDARVIS LAW OFFICES, P.C., certify that I have served one (1) copy of the APPELLANT'S CERTIFICATE OF COMPLIANCE dated June 13, 2017, upon counsel for Respondents, by depositing a copy of the same in the United States Mail, postage prepaid, on the 13th day of June, 2017, addressed to:

M. Dawes Cooke, Jr., J.D.
Phillip S. Ferderigos, J.D.
BARNWELL, WHALEY, PATTERSON & HELMS, LLC
PO. Drawer H
Charleston, SC 29402
mdc@barnwell-whaley.com
pferderigos@barnwell-whaley.com

Attorneys for Defendants Jerry N. Theos
and URICCHIO, HOWE, KRELL, JACOBSON,
TOPOREK, THEOS & KEITH, P.A.

Jennifer H. Thiem, J.D.
Karen E. Spain, J.D.
K&L GATES LLP
134 Meeting Street, Suite 200
Charleston, SC 29401
jennifer.thiem@klgates.com
karen.spain@klgates.com

Attorney for Cheryl D. Shoun

George J. Kefalos, J.D.
GEORGE J. KEFALOS, PA
46A State Street
Charleston, SC 29401
george@kefaloslaw.com

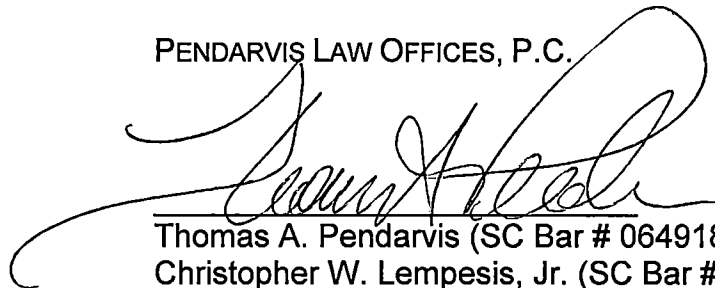
Attorney for Defendant TAYLOR
BOWLEY AND BYRD, LLC

Oana D. Johnson, J.D.
Attorney at Law
215 East Bay Street, Suite 406
Charleston, SC 29401
oana@odjlaw.com

Attorney for Defendant TAYLOR
BOWLEY AND BYRD, LLC

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis (SC Bar # 064918)
Christopher W. Lempesis, Jr. (SC Bar #77012)
710 Boundary Street, Suite 1-A
Beaufort, SC 29902
843.524.9500 Tel.
Thomas@PendarvisLaw.com
Chris@PendarvisLaw.Com

Counsel for PERSONAL CARE, INC.

Beaufort, South Carolina
June 13, 2017

PENDARVIS LAW OFFICES, PC



June 13, 2017

VIA US MAIL

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

Re: *Personal Care, Inc., v. Jerry N. Theos, et al.*
Appellate Case No. 2016-001266

RECEIVED
JUN 14 2017
SC Court of Appeals

Dear Ms. Kitchings:

This is response to the letters from the Court, each dated June 9, 2017. Enclosed for filing, please find the original and ten(10) copies of Appellant's Certificate of Compliance intended to address noted deficiencies related to Rules 210(g) and 211(a), SCACR. Please return a clocked copy of the revised Certificate of Compliance in the postage pre-paid, self-addressed return packaging, enclosed for your convenience.

Also enclosed, please find shipping labels to be used for the return of Volume 2 of the Record on Appeal. Per your instructions once we receive the copies of Volume 2, we will insert an index in to each Volume 2 copy, and return them for filing.

Based on shipping times, we are concerned the time necessary to insert the index may take longer than June 19, 2017, to complete. Please accept this letter as a motion for an extension of time for an additional 10 days to make the corrections. Also enclosed please find a check for \$25 representing the filing fee for this motion.

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.

Thomas A. Pendarvis

TAP/ses
Enclosures

THOMAS A. PENDARVIS, J.D.
Admitted in SC and GA
Thomas@PendarvisLaw.com
Board Certified in Legal Malpractice
by the American Board of
Professional Liability Attorneys

710 BOUNDARY STREET, UNIT A1
BEAUFORT, SC 29902-4188
PendarvisLaw.com
843.524.9500

CHRISTOPHER W. LEMPESIS, JR.
Juris Doctor and Master of Laws
Chris@PendarvisLaw.com

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Page 2
June 13, 2017

cc w/encls: M. Dawes Cooke, Jr., J.D.
Phillip S. Ferderigos, J.D.
George J. Kefalos, J.D.
Jennifer H. Thiem, J.D.
Karen E. Spain, J.D.
Oana D. Johnson, J.D.

PRESS FIRMLY TO SEAL

PRESS FIRMLY TO SEAL

PRIORITY ★ MAIL ★ EXPRESS™

OUR FASTEST SERVICE IN THE U.S.

WHEN USED INTERNATIONALLY,
A CUSTOMS DECLARATION
LABEL MAY BE REQUIRED.



EP13F July 2013 OD: 12.5 x 9.5



E

US POSTAGE & FEES PAID
PRIORITY MAIL EXPRESS
FR EW
COMMERCIAL BASE PRICING

062S0009613051
FROM 29902



stamps.com
06/13/2017

PRIORITY MAIL EXPRESS 1-DAY™

Pendarvis Law Offices, P.C.
710 Boundary Street, Unit A-1
Beaufort SC 29902

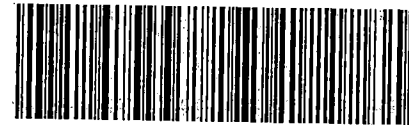
0007
(843) 524-9500

WAIVER OF SIGNATURE
SCHEDULED DELIVERY 12:00 PM

B012

SHIP TO: The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia SC 29211-1629

USPS TRACKING



9470 1118 9956 4228 0228 02

INTERNATIONAL
MAIL HERE

REQUEST

Signature required for complete delivery.