

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

---

Appellate Case No. 2016-002487

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RECEIVED  
MAR 27 2018  
SC Court of Appeals

Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal  
Representatives of the Estate of Evan Morris Myers, Appellants,

v.

The Consolidated Employee Recreation Clubs, a non-profit organization a/k/a  
Pine Island Club at Lake Murray; South Carolina Electric and Gas Holding  
Company, Inc.; SCANA, Respondents.

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**PROOF OF SERVICE**

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I hereby certify that one copy of the *Final Reply Brief of Appellant* in the above-referenced matter was served by U.S. Mail, postage prepaid, on March 26, 2018 addressed to the following counsel of record:

Christian Stegmaier, Esquire  
PO Box 12487  
Columbia, SC 29211  
*Attorney for Respondents*

Megan Hazelwood Hall, Esquire  
Kelsey Jan Brudvig, Esquire  
1330 Lady Street  
Sixth Floor  
Columbia, SC 29201  
*Attorneys for Respondents*

**GRAHAM LAW FIRM, P.A.**



---

Edward L. Graham (SC Bar: 2483)  
Post Office Box 550  
Florence, SC 29501  
t. (843) 662-3281  
*Attorney for Appellants*

**KROMPECHER LAW FIRM, PLLC**  
Pedro E. Krompecher, III (SC Bar: 100485)  
Post Office Box 6639  
Raleigh, NC 27628  
*Attorney for Appellants*

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Company, Inc.; SCANA; and Mandy Nicole Bellamy, Respondents.

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**CERTIFICATE OF COUNSEL**

---

The undersigned counsel for Appellants certify that this Final Reply Brief of Appellants  
complies with Rule 211(b), SCACR.

**GRAHAM LAW FIRM, P.A.**



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Edward L. Graham (SC Bar: 2483)  
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Christian Stegmaier, Esquire  
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**CERTIFICATE OF COUNSEL**

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The undersigned counsel for Appellants certify that this Final Brief of Appellants  
complies with Rule 211(b), SCACR.

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Edward L. Graham (SC Bar: 2483)  
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*Attorney for Appellants*

March 26, 2018



# GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham  
Diane M. Rodriguez

March 26, 2018

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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MAR 27 2018  
SC Court of Appeals

Re: *Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal Representatives of the Estate of Evan Morris Myers, Appellants, v. The Consolidated Employee Recreation Clubs, a non-profit organization a/k/a Pine Island Club at Lake Murray; South Carolina Electric and Gas Holding Company, Inc.; SCANA, Respondents.*  
Appellate Case No. 2016-002487

Dear Ms. Kitchings:

Enclosed for filing is one, unbound original and fifteen (15) bound copies of the ***Appellants' Final Brief*** and the ***Appellants' Final Reply Brief*** in the above case. One original and one copy of the Certification of Counsel and the Proof of Service for each are also enclosed for filing. Please return a clocked copy of the ***Appellants' Final Brief***, the ***Appellants' Final Reply Brief***, the Certifications of Counsel, and the Proofs of Service to me using the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving attorneys for Respondents with a copy of the same.

Thank you for your attention to this matter.

Very truly yours,

Edward L. Graham  
Pedro Krompecher

Enclosures

cc: Christian Stegmaier  
Megan H. Hall  
Kelsey Jan Brudvig

GRAHAM LAW FIRM, P.A.  
383 West Cheves Street, Florence, SC 29501

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Diane M. Rodriguez

March 26, 2018

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Kelsey Jan Brudvig  
Collins & Lacy, P.C.  
1330 Lady Street  
Sixth Floor  
Columbia, SC 29201

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Appellate Case No. 2016-002487

Dear Ms. Brudvig:

Enclosed are the the *Appellants' Final Brief* and the *Appellants' Final Reply Brief* in the above case, which I hereby serve upon you.

Very truly yours,

Edward L. Graham  
Pedro Krompecher

Enclosures

cc: The Honorable Jenny Abbott Kitchings

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Dear Ms. Hall:

Enclosed are the the *Appellants' Final Brief* and the *Appellants' Final Reply Brief* in the above case, which I hereby serve upon you.

Very truly yours,

Edward L. Graham  
Pedro Krompecher

Enclosures

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Dear Mr. Stegmaier:

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Very truly yours,

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Enclosures

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