

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. 2018-000171

RECEIVED
MAR 07 2019
SC Court of Appeals

Cleo Sanders,

Respondent,

v.

Savannah Highway Automotive Company, a
General Partnership d/b/a Rick Hendrick Dodge
Chrysler Jeep Ram, Santander Consumer US
Holdings Inc., Isiah S. White, Danny Anderson, and
Patrick Bachrodt, Jr.

Defendants,.

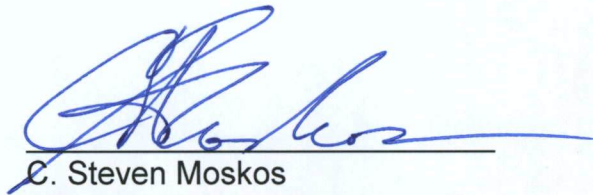
Of whom Savannah Highway Automotive Company,
a General Partnership d/b/a Rick Hendrick Dodge
Chrysler Jeep Ram and Isiah S. White,

Appellants.

PROOF OF SERVICE

I certify that on March 6, 2019, I served the forgoing Brief of Respondent on Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White by depositing a copy in Federal Express, postage prepaid, and addressed to their attorney of record, John T. Lay, Jr. at Gallivan, White and Boyd, PA, 1201 Main Street, Suite 1200, Columbia, SC 29201.

SIGNATURE ON NEXT PAGE



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March 6, 2019

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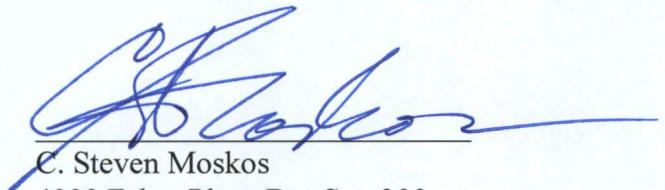
Defendants,.

Of whom Savannah Highway Automotive Company, a
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Jeep Ram and Isiah S. White,

Appellants.

CERTIFICATE OF COUNSEL

The undersigned certifies that this Final Brief of Respondent complies with Rule 211(b),
SCACR.



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March 6, 2019

C. STEVEN MOSKOS, P.A.

Attorney and Counselor at Law

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Board Certified Civil Trial Attorney
Board Certified Civil Pretrial Advocate
By the National Board of Trial Advocacy
Supreme Court of South Carolina Certified Mediator

M

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March 6, 2019

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

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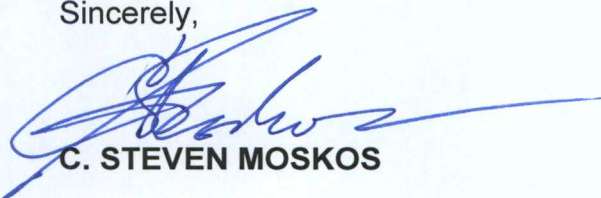
**Re: Cleo Sanders vs. Savannah Highway Automotive Company, et. al.
Appellate Case No. 2018-000171**

Dear Ms. Kitchings:

Please find enclosed one original and fourteen copies of Cleo Sanders' Final Response Brief, a Certificate of Counsel per Rule 211(b), and a Proof of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,



C. STEVEN MOSKOS

CSM/csb

Enclosures

cc: John Lay, Esq.
Cleo Sanders