

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

\_\_\_\_\_  
Appeal from Horry County  
Court of Common Pleas

William H. Seals Jr., Circuit Court Judge

\_\_\_\_\_  
Case No. 2015-CP-26-05573  
\_\_\_\_\_

K.A. Diehl and Associates, Inc.,

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AUG 20 2019

**SC Court of Appeals**

Respondent,

v.

James Perkins, Colleen Franke a/k/a Colleen Franke Perkins,  
Mark Dos Santos, Nancy Moore, William Moore, Steven Dame  
and Errol Dos Santos,

Defendants,

Of whom Mark Dos Santos is the

Appellant.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

YOUNG CLEMENT RIVERS, LLP  
D. Jay Davis Jr. (SC Bar No. 12084)  
Russell G. Hines (SC Bar No. 72100)  
Perry M. Buckner IV (SC Bar No. 100031)  
J. Joseph Owens (SC Bar No. 102794)  
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Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 577-4000

*Attorneys for Appellant*

I, Russell G. Hines, of Young Clement Rivers, LLP, attorney for Appellant, hereby certify that the **FINAL BRIEF OF APPELLANT**, the **FINAL REPLY BRIEF OF APPELLANT** and the **APPELLANT'S CERTIFICATION FOR FINAL BRIEF** were served on all other parties to this matter by depositing a copy of same in the U.S. Mail on August 19, 2019, properly posted for delivery to the following addressees:

Henrietta U. Golding, Esquire  
Alicia E. Thompson, Esquire  
Burr & Forman, LLP  
P.O. Box 336  
Myrtle Beach, SC 29578

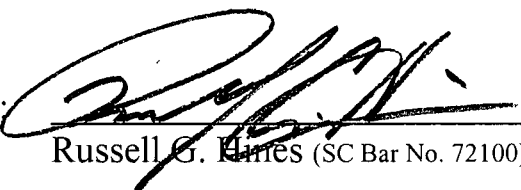
Jackson H. Daniel, III, Esquire  
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*Attorney for Mark dos Santos*

*and*

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Columbia, SC 29211

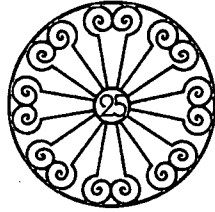
*Attorneys for Respondent  
K.A. Diehl and Associates, Inc.*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By:   
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Appellant*

Charleston, South Carolina

Dated: 8/19/19



# YCR LAW

Kathleen B. Barnes  
Secretary

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August 19, 2019

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

Re: K.A. Diehl and Associates, Inc. v. James Perkins, Colleen Franke, a/k/a Colleen Franke Perkins, Mark Dos Santos, Nancy Moore, William Moore, Steven Dame, and Errol Dos Santos, Of whom Mark Dos Santos is the Appellant  
Appellate Case No. 2018-002009  
Case No.: 2015-CP-26-05573  
Claim No.: 916718  
YCR File: 14168-20180194

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed please find the following:

1. Original and Sixteen (16) copies of the Final Brief of Appellant;
2. Original and Sixteen (16) copies of the Final Reply Brief of Appellant;
3. Original and One (1) copy of Appellant's Certification for Final Brief;
4. Original and One (1) copy of the Proof of Service for same.

Please file the originals and return court stamped copies of each document to me in the enclosed envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes  
Secretary

Enclosures

Cc: Henrietta U. Golding, Esquire, Burr & Forman, LLP  
Alician E. Thompson, Esquire, Burr & Forman, LLP  
Wm. Grayson Lambert, Esquire, Burr & Forman, LLP  
Jackson H. Daniel, III, Esquire, Carlock Copeland & Stair, LLP

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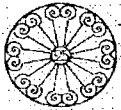
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14168-  
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Jenny Abbott Kitchings, Clerk of  
Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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**SC Court of Appeals**