

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

---

Appellate Case No. 2018-002166  
Trial Court Case No. 2016-CP-39-01223

---

**RECEIVED**  
AUG 26 2019  
SC Court of Appeals

Kevin M. Granatino, ..... Appellant,

vs.

Calvin Williams, Clemson University, South Carolina  
Department of Transportation, and Thrift Development Corporation, ..... Defendants,

Of which South Carolina Department of Transportation and  
Thrift Development Corporation are ..... Respondents.

---

**APPELLANT'S RESPONSE IN OPPOSITION TO  
RESPONDENTS' MOTION TO STRIKE**

---

Steven Edward Buckingham (S.C. Bar No. 0075089)  
The Law Office of Steven Edward Buckingham  
16 Wellington Avenue  
Greenville, South Carolina 29609  
(o) 864.735.0832  
(e) seb@buckingham.legal

Stephen R.H. Lewis (S.C. Bar No. 012947)  
Covington, Patrick, Hagins, Stern & Lewis  
211 Pettigru Street  
Greenville, South Carolina 29601  
(o) 864.240.5518  
(e) slewis@covpatlaw.com

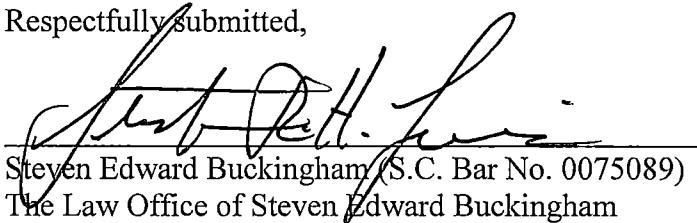
George L. Marlette, III (*admitted pro hac vice*)  
Law Offices of George L. Marlette  
80 Washington Street / J-39  
Norwell, Massachusetts 02061  
(o) 781.871.1861  
(e) gmarlette@marllettelaw.com

*Attorneys for Appellant*

Respondents' Motion to Strike is now moot. Respondents complain that the items identified in the Motion to Strike are not pertinent to this appeal because they were included only in the "Concluding Statement" section of Appellant's Initial Brief. Such items are now addressed with specificity in the "Responsive Argument" section of Appellant's Reply Brief; specifically, in Section II.C.

Furthermore, after the Record on Appeal is finalized and Appellant is capable of providing specific page references to such matter as set forth in the Record, Respondents' complaint as to a lack of citations to such matter will be corrected.

Respectfully submitted,



Steven Edward Buckingham (S.C. Bar No. 0075089)  
The Law Office of Steven Edward Buckingham  
16 Wellington Avenue  
Greenville, South Carolina 29609  
(o) 864.735.0832  
(e) seb@buckingham.legal

Stephen R.H. Lewis (S.C. Bar No. 012947)  
Covington, Patrick, Hagins, Stern & Lewis  
211 Pettigru Street  
Greenville, South Carolina 29601  
(o) 864.240.5518  
(e) slewis@covpatlaw.com

George L. Marlette, III (*admitted pro hac vice*)  
Law Offices of George L. Marlette  
80 Washington Street / J-39  
Norwell, Massachusetts 02061  
(o) 781.871.1861  
(e) gmarlette@marlettelaw.com

*Attorneys for Appellant*

August 23, 2019

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM PICKENS COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

---

**RECEIVED**

AUG 26 2019

**SC Court of Appeals**

Appellate Case No. 2018-002166  
Trial Court Case No. 2016-CP-39-01223

---

Kevin M. Granatino, .....  
Appellant,

vs.

Calvin Williams, Clemson University, South Carolina  
Department of Transportation, and Thrift Development Corporation, .....  
Defendants,

Of which South Carolina Department of Transportation and  
Thrift Development Corporation are .....  
Respondents.

---

**PROOF OF SERVICE**

---

The undersigned counsel for Appellant hereby certifies, subject to penalty of perjury, that the following document(s) was/were served upon the following counsel of record by the following means as of the date identified below.

**Document(s):** (1) Appellant's Initial Reply Brief  
(2) Appellant's Response in Opposition to the Motion to Strike

**Counsel Served:** (1) For Respondent Thrift Development Corporation

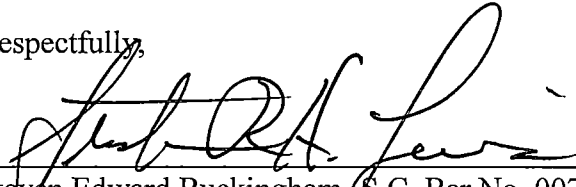
Gallivan, White & Boyd, P.A.  
C. Stuart Mauney, Esq.  
Robert D. Corney, Esq.  
William T. Young, III, Esq.  
55 Beattie Place / Suite 1200  
Greenville, South Carolina 29601

(2) Logan, Jolly & Smith  
James W. Logan, Jr.  
1805 N. Boulevard  
Anderson, South Carolina 29621

**Means of Delivery:**

**Date:** August 23, 2019

Respectfully,



Steven Edward Buckingham (S.C. Bar No. 0075089)  
The Law Office of Steven Edward Buckingham  
16 Wellington Avenue  
Greenville, South Carolina 29609  
(o) 864.735.0832  
(e) seb@buckingham.legal

Stephen R.H. Lewis (S.C. Bar No. 012947)  
Covington, Patrick, Hagins, Stern & Lewis  
211 Pettigru Street  
Greenville, South Carolina 29601  
(o) 864.240.5518  
(e) slewis@covpatlaw.com

George L. Marlette, III (*admitted pro hac vice*)  
Law Offices of George L. Marlette  
80 Washington Street / J-39  
Norwell, Massachusetts 02061  
(o) 781.871.1861  
(e) gmarlette@marlettelaw.com

*Attorneys for Appellant*

**STEPHEN R. H. LEWIS, P.A.**  
**Attorney at Law**

Mailing Address:  
211 Pettigru Street  
Greenville, SC 29601

www.covpatlaw.com  
Tax I.D. #47-2510710  
(864) 242-9000

E-Mail: slewis@covpatlaw.com  
(864) 240-5518 Direct Dial  
(864) 233-9777 Fax  
(800) 849-2988 Toll-Free

August 23, 2019

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

**RECEIVED**

AUG 26 2019

SC Court of Appeals

**RE: Kevin M. Granatino v. Williams, et al.**  
**Appellate Case No.: 2018-002166**

Dear Ms. Kitchings:

Please find enclosed the following documents:

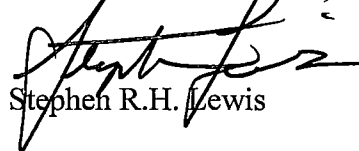
1. An original and seven copies of Appellant's Response in Opposition to Respondents' Motion to Strike;
2. An original and two copies of the Reply Brief of Appellant; and,
3. An original and two copies of the Proof of Service.

I would appreciate receiving a filed copy of these documents and enclose a self-addressed envelope for your convenience in returning the same to me. Further, a copy of all documents has been mailed to all parties for their records.

Should you have any questions or need anything further, please do not hesitate to contact me or Deborah Scott in my office.

Sincerely,

STEPHEN R.H. LEWIS, P.A.



Stephen R.H. Lewis

SRHL:dcs

Enclosures

cc: George L. Marlette, III / Steven E. Buckingham  
James W. Logan, Jr.  
C. Stuart Mauney/Robert D. Corney/William T. Young, III



US POSTAGE  
\$07.35<sup>9</sup>  
Priority Mail  
Mailed From 29601  
08/23/2013  
032A 0061802672

FROM: Stephen R. H. Lewis, P.A.  
Attorney at Law  
Post Office Box 2343  
Greenville, South Carolina 29602

TO: The Honorable Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RECEIVED  
AUG 26 2013  
SC Court of Appeals

