



DELIVERED VIA U.S.P.S. AND FACSIMILE (803) 734- 1839

Clerk of Court  
ATTN: Caitlyn  
Court of Appeals  
1220 State Street  
Columbia, SC 29201

**RECEIVED**  
DEC 16 2019  
SC Court of Appeals

December 11, 2019

**Re: Appellate Case No.: 2019-001719  
Innovative Waste Management, Inc., Respondent, v. Crest Energy Partners  
GP, LLC et al.**

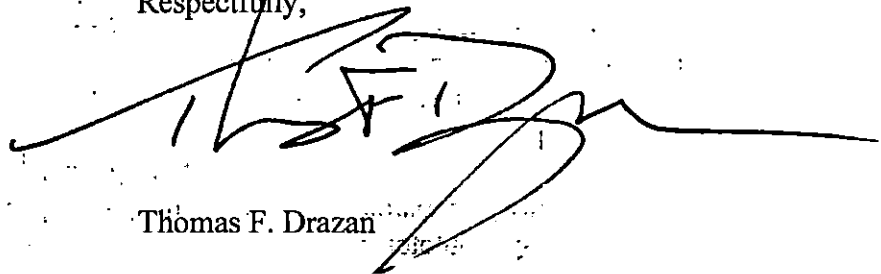
Caitlyn,

As discussed I wanted to inform the Court that Respondents received Appellants Motion for Reinstatement and to File Out of Time on December 2, 2019 despite what the proof of service states. Attached please find three e-mails from December 2, 2019, the first where Mr. Marvel informs the lower Court he has filed the Motion for Reinstatement, Mr. Gruenloh's request for the Motion as we had not received it, and Mr. Marvel's response confirming the Motion was actually delivered to Respondents on December 2, 2019.

As our Reply to Appellants Motion for Reinstatement and to File out of Time was received by the Court today December 11, 2019, I believe us to be in compliance with the ten day reply requirement. If the Court would like us to file a request to file out of time please let me know and we will immediately file the motion.

Thank you very much for your attention to this matter and please feel free to contact me if you have any questions or concerns at 843-577-0027.

Respectfully,



Thomas F. Drazan

Cc: David Marvel, Esquire

**From:** David B. Marvel dave@marvel.lawyer  
**Subject:** Re: 12-1227 IWM v. Crest Energy Partners, et al.  
**Date:** December 2, 2019 at 9:30 AM



**To:** Wm. Michael Gruenloh mike@gruenlohlaw.com, Murphy, Maite Law Clerk (Pamela Larson) mmurphy1c@sccourts.org, Becky Stevens BStevens@dorchestercountysc.gov  
**Cc:** Thomas Drazan thomas@gruenlohlaw.com, Ryan Jones ryan@gruenlohlaw.com, Jake Barker Jbarker@givlawfirm.com, Fritz Jekel fritz@j-dlaw.com

Good Morning, I hope that everyone had a grand Thanksgiving Holiday. In response to Mike's email below, please note that the appeal was administratively dismissed, and the case has not been remitted. I filed a Motion to Reinstate as soon as I became aware of the issue. Mike, you should have received that by Fedex last Wednesday, but it looks like it was delayed in transit for some reason and your office was closed on Friday. We will keep everyone advised of the status of the appeal. Please let me know if you need anything further from me.

Best regards,

David B. Marvel  
PO Box 22734  
Charleston, South Carolina 29413  
Ph. 843.853.4877  
Fax 843.380.3025  
Email: dave@marvel.lawyer

**RECEIVED**

DEC 16 2019

SC Court of Appeals

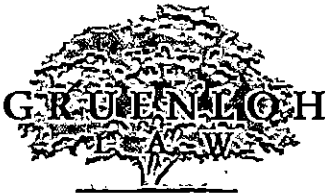
**From:** Wm. Michael Gruenloh <mike@gruenlohlaw.com>  
**Sent:** Monday, December 2, 2019 9:00 AM  
**To:** Murphy, Maite Law Clerk (Pamela Larson); Becky Stevens  
**Cc:** David B. Marvel; Thomas Drazan; Ryan Jones; Jake Barker; Fritz Jekel  
**Subject:** Re: 12-1227 IWM v. Crest Energy Partners, et al.

Good morning Pam and Becky. I hope you had a nice holiday.

The appeal in this matter was dismissed on November 21st. We'd like to schedule the damages hearing that was previously set for October 15th for the defendants that are in default. Also, we would like to have the case restored to the trial docket for the remaining defendant Mr. Girardeau. Please let us know if there is anything we can do to assist in having the hearing scheduled and the case restored to the trial docket.

Thank you.

Mike



Gruenloh Law - Charleston law firm

gruenlohlaw.com

Gruenloh Law Firm practice areas accidents, malpractice, representation

Wm. Michael Gruenloh, Esq.  
Partner  
T 843.577-0027  
F 843.577.0721  
E mike@gruenlohlaw.com  
A 67 MOULTRIE STREET, 2ND FLOOR, CHARLSTON, SC 29403



**From:** Wm. Michael Gruenloh mike@gruenlohlaw.com  
**Subject:** Re: 12-1227 IWM v. Crest Energy Partners, et al.  
**Date:** December 2, 2019 at 2:05 PM

**To:** David B. Marvel dave@marvel.lawyer  
**Cc:** Murphy, Maite Law Clerk (Pamela Larson) mmurphy@cscourts.org, Becky Stevens BStevens@dorchestercountysc.gov, Thomas Drazan thomas@gruenlohlaw.com, Ryan Jones ryan@gruenlohlaw.com, Jake Barker Jbarker@glvlawfirm.com, Fritz Jekel fritz@j-dlaw.com

Mr. Marvel:

Could you kindly send us a copy of the document that you are representing that you filed? We have not received it.

Thanks



[gruenlohlaw.com](http://gruenlohlaw.com)  
 Wm. Michael Gruenloh, Esq.  
 Partner  
 T 843.577-0027  
 F 843.577.0721  
 E [mike@gruenlohlaw.com](mailto:mike@gruenlohlaw.com)  
 A 67 MOULTRIE STREET, 2ND FLOOR, CHARLESTON, SC 29403

CONFIDENTIALITY NOTICE: This electronic mail transmission has been sent by an attorney. It may contain information that is confidential, privileged, proprietary or otherwise legally exempt from disclosure. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retransmit, copy or disseminate this message, or any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your system without reading the content and notify the sender immediately of the inadvertent transmission. There is no intent on the part of the sender to waive any privilege, including the attorney-client privilege, that may attach to this communication. Thank you for your cooperation.

IRS CIRCULAR 210 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing, or recommending to another party any transaction or matter addressed in this communication or attachment.

On Mon, Dec 2, 2019 at 9:30 AM David B. Marvel <dave@marvel.lawyer> wrote:

Good Morning, I hope that everyone had a grand Thanksgiving Holiday. In response to Mike's email below, please note that the appeal was administratively dismissed, and the case has not been remitted. I filed a Motion to Reinstate as soon as I became aware of the issue. Mike, you should have received that by Fedex last Wednesday, but it looks like it was delayed in transit for some reason and your office was closed on Friday. We will keep everyone advised of the status of the appeal. Please let me know if you need anything further from me.

Best regards,

David B. Marvel  
 PO Box 22734  
 Charleston, South Carolina 29413  
 Ph. 843.853.4877  
 Fax 843.380.3025  
 Email: dave@marvel.lawyer

**From:** Wm. Michael Gruenloh <mike@gruenlohlaw.com>  
**Sent:** Monday, December 2, 2019 9:00 AM  
**To:** Murphy, Maite Law Clerk (Pamela Larson); Becky Stevens  
**Cc:** David B. Marvel; Thomas Drazan; Ryan Jones; Jake Barker; Fritz Jekel  
**Subject:** Re: 12-1227 IWM v. Crest Energy Partners, et al.

Good morning Pam and Becky. I hope you had a nice holiday.

The appeal in this matter was dismissed on November 21st. We'd like to schedule the damages hearing that was previously set for October 15th for the defendants that are in default. Also, we would like to have the case restored to the trial docket for the remaining defendant Mr. Girardeau. Please let us know if there is anything we can do to assist in having the hearing scheduled and the case restored to the trial docket.

Thank you.

Mike





**From:** David B. Marvel [dave@marvel.lawyer](mailto:dave@marvel.lawyer)  
**Subject:** Re: 12-1227 IWM v. Crest Energy Partners, et al.  
**Date:** December 2, 2019 at 4:07 PM  
**To:** Wm. Michael Gruenloh [mike@gruenlohlaw.com](mailto:mike@gruenlohlaw.com)  
**Cc:** Murphy, Maite Law Clerk (Pamela Larson) [mmurphy@sccourts.org](mailto:mmurphy@sccourts.org), Becky Stevens [BStevens@dorchestercountysc.gov](mailto:BStevens@dorchestercountysc.gov),  
 Thomas Drazan [thomas@gruenlohlaw.com](mailto:thomas@gruenlohlaw.com), Ryan Jones [ryan@gruenlohlaw.com](mailto:ryan@gruenlohlaw.com), Jake Barker [jbarker@glvlawfirm.com](mailto:jbarker@glvlawfirm.com),  
 Fritz Jekel [fritz@j-dlaw.com](mailto:fritz@j-dlaw.com)

I just left a meeting and received your email, along with a voice mail from the delivery driver that it was delivered to your office today at 2:15. Apparently there was a delivery exception in that the address on the slip was 63, not 67, but otherwise correct and they figured it out. I'm not sure how that happened but it otherwise did not affect the delivery. Please let me know if you haven't received that package of filings.

On Dec 2, 2019, at 2:05 PM, Wm. Michael Gruenloh <[mike@gruenlohlaw.com](mailto:mike@gruenlohlaw.com)> wrote:

Mr. Marvel:

Could you kindly send us a copy of the document that you are representing that you filed? We have not received it.

Thanks



[gruenlohlaw.com](http://gruenlohlaw.com)  
 Wm. Michael Gruenloh, Esq.  
 Partner  
 T 843.577-0027  
 F 843.577.0721  
 E [mike@gruenlohlaw.com](mailto:mike@gruenlohlaw.com)  
 A 67 MOULTRIE STREET, 2ND FLOOR, CHARLESTON, SC 29403

CONFIDENTIALITY NOTICE: This electronic mail transmission has been sent by an attorney. It may contain information that is confidential, privileged, proprietary or otherwise legally exempt from disclosure. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain, copy, or disseminate this message, or any part of it, or any attachments. If you have received this message in error, please delete this message and any attachments from your system without making the content and notify the sender immediately of the unauthorized transmission. There is no intent on the part of the sender to waive any privilege, including the attorney-client privilege, that may attach to this communication. Thank you for your cooperation.

IRS CIRCULAR 230 NOTICE: To assure compliance with requirements imposed by the IRS, we inform you that any U.S. tax advice contained in this communication (or in any attachments) is not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing, or recommending to another party any transaction or matter addressed in this communication or attachment.

On Mon, Dec 2, 2019 at 9:30 AM David B. Marvel <[dave@marvel.lawyer](mailto:dave@marvel.lawyer)> wrote:

Good Morning, I hope that everyone had a grand Thanksgiving Holiday. In response to Mike's email below, please note that the appeal was administratively dismissed, and the case has not been remitted. I filed a Motion to Reinstate as soon as I became aware of the issue. Mike, you should have received that by Fedex last Wednesday, but it looks like it was delayed in transit for some reason and your office was closed on Friday. We will keep everyone advised of the status of the appeal. Please let me know if you need anything further from me.

Best regards,

David B. Marvel  
 PO Box 22734  
 Charleston, South Carolina 29413  
 Ph. 843.853.4877  
 Fax. 843.380.3025  
 Email: [dave@marvel.lawyer](mailto:dave@marvel.lawyer)

**From:** Wm. Michael Gruenloh <[mike@gruenlohlaw.com](mailto:mike@gruenlohlaw.com)>  
**Sent:** Monday, December 2, 2019 9:00 AM  
**To:** Murphy, Maite Law Clerk (Pamela Larson); Becky Stevens  
**Cc:** David B. Marvel; Thomas Drazan; Ryan Jones; Jake Barker; Fritz Jekel  
**Subject:** Re: 12-1227 IWM v. Crest Energy Partners, et al.

Good morning Pam and Becky. I hope you had a nice holiday.

The appeal in this matter was dismissed on November 21st. We'd like to schedule the damages hearing that was previously set for October 15th for the defendants that are in default. Also, we would like to have the case restored to the trial docket for the remaining defendant Mr. Girardeau. Please let us know if there is anything we can do to assist in having the hearing scheduled and the case restored to the trial docket.

Thank you.

Mike



GRUENLOH  
L A W

67 MOULTRIE STREET, SECOND FLOOR  
CHARLESTON, SOUTH CAROLINA 29403

Clerk of Court  
Attn: Caitlyn  
Court of Appeals  
1220 State Street  
Columbia, SC 29201

2920183769 COTE



UNITED STATES POSTAGE



\$000.50<sup>00</sup>

02 1P  
0000745062 DEC 11 2019  
MAILED FROM ZIP CODE 29403

RECEIVED  
DEC 18 2019  
SC Court of Appeals

