

# DAVID B. MARVEL

Attorney at Law • Proctor in Admiralty  
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January 31, 2019

**RECEIVED**

JAN 31 2020

SC Court of Appeals

**VIA FAX TO (803) 734-1839 and U.S. Mail**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Innovative Waste Mgmt. v. Crest Energy Partners, *et al.*  
Case No. 2019-001719

Dear Ms. Kitchings,

I hope this letter finds you well. While I have no intention of initiating or engaging in a debate with Mr. Gruenloh by way of your office, I am compelled to respond to his letter of January 27, 2020.

My recent correspondence referenced by Mr. Gruenloh was transmitted pursuant to Rule 207(a)(1), SCACR, which requires an appellant to provide court reporter correspondence to the Court and opposing counsel. Admittedly, the information contained therein may be relevant to the issue of whether the Respondent was prejudiced by my initial delay in ordering the transcripts. However, my letters only served to advise of our progress in gathering those materials, as required by the Appellate Court Rules.

As stated in my letter of December 20, 2019, Appellants felt that a formal reply to Respondent's memorandum in opposition would not have been helpful to the issues raised in the Motion to Reinstate, electing instead to rely on the original motion. While we remain willing to reply to any issue raised by the Respondent's memorandum, my correspondence to your office was not intended as a response or supplement to any prior filing.

Thank you for your continued assistance with this matter. With best regards, I remain

Sincerely,

David B. Marvel

/DBM

cc: Wm. Michael Gruenloh (*via facsimile*)

# KASSEL McVEY

**JOHN D. KASSEL**  
ATTORNEY AT LAW  
JKASSEL@KASELLAW.COM

**THEILE B. McVEY**  
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## FACSIMILE COVER SHEET

**ATTACHMENT/COMMENT:**

**Fax Number: 803-734-1839**

**Pages 2**

**TO:** SC Court of Appeals  
**FROM:** Kassel McVey Law Firm

**Re: Re:** *Stephany Connely and James M. Connelly v. The Main Street America Group*  
Court of Appeal Case No. 2017-002234

Please see attached letter in reference to the above case.

Thank you,

**RECEIVED**

JAN 31 2020

SC Court of Appeals

**Stephanie L. Fanning**  
Paralegal to John D. Kassel  
and Theile B. McVey  
KASSEL McVEY ATTORNEYS AT LAW  
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JOHN D. KASSEL, ATTORNEY AT LAW, LLC

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January 31, 2020

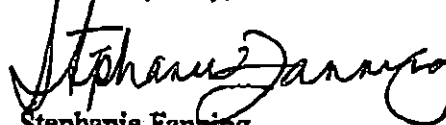
The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

Re: *Stephany Connelly and James M. Connelly v. The Main Street America Group*  
Court of Appeal Case No. 2017-002234

Dear Ms. Kitchings:

Thank you for notifying us of potential dates that this case may be argued. We are ready to argue this case on May 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, and 7<sup>th</sup>, 2020, with no conflicts. However, May 12<sup>th</sup>, 13<sup>th</sup>, and 14<sup>th</sup>, 2020 we are not available to argue this case. Please let me know if you have any questions or concerns.

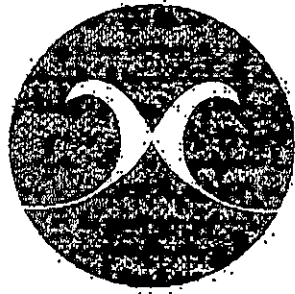
Yours very truly,



Stephanie Fanning  
Paralegal to John D. Kassel  
and Theile B. McVey

SLF:bmh  
Enclosures

cc: A. Johnston Cox, Esquire  
Ashley B. Stratton, Esquire  
Benjamin D. McCoy, Esquire  
Thomas F. Dougall, Esquire  
Michal Kalwajtys, Esquire



**FAX COVER SHEET**

**TO:** Clerk, SCCOA (803) 734-1839  
Mike Gruenloh (843) 577-0721

**FROM:** David B. Marvel

**RE:** IWM v. Crest Energy Partners  
Case No. 2019-001719

2 Pages Including Cover

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