

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 2019-001199

Michelle M. Messer,Appellant,

v.

William J. Muse, Individually and as President of NEM, Inc.; NEM, Inc. d/b/a The Sandy
Monkey; Sharon Cumbie; Kathryn Montorio; and Christopher B. Campbell, Defendants,

Of which William J. Muse, Individually and as President of NEM, Inc.; NEM, Inc. d/b/a The
Sandy Monkey; Sharon Cumbie; and Kathryn Montorio are the Respondents,

.....Respondents.

CERTIFICATE OF COUNSEL

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

Signature on following page

By:



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AND KATHRYN MONTORIO**

Florence, South Carolina
March 24, 2020

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March 25, 2020

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MAR 26 2020
SC Court of Appeals

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

Re: Michelle M. Messer, Appellant v. William J. Muse, Individually and as
President of NEM, Inc.; NEM, Inc. d/b/a The Sandy Monkey; Sharon Crumbie;
and Kathryn Montorio, Respondents.
Appellate Case No.: 2019-001-199
Our File No.: 33152

Dear Ms. Kitchings and Ms. Allen:

In response to the letter dated March 24, 2020 from the South Carolina Court of Appeals, see attached, I am enclosing a Certificate of Counsel and a Proof of Service. Should you require additional filings or in the event these enclosures are not a sufficient response to your letter, please do not hesitate to contact me.

Thank you for your assistance in this matter. Should you have any questions or comments regarding any of the above, please do not hesitate to call.

With kind regards, I remain

Sincerely,



JENNY DRAFFIN SMITH

JDS/lhn
Enclosures

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March 25, 2020

Page 2

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The South Carolina Court of Appeals

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March 24, 2020

Mr. J. Boone Aiken, III, Esquire
PO Drawer 1931
Florence SC 29503

Re: Michelle M. Messer v. William J. Muse et al.
Appellate Case No. 2019-001199

Dear Counsel:

Upon reviewing your respondents' final brief, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and these deficiencies must be corrected within ten (10) days of the date of this letter or your respondents' final brief will not be considered:

- The respondents' final brief is not accompanied by the required certificate of counsel.
- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

V. Claire Allen, Deputy

CLERK

cc: Justin D. Bice, Esquire
Jenny Draffin Smith, Esquire

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