

**From:** [Drew Radeker](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Rhonda Schaub](#); [debbie@salleylawfirm.com](mailto:debbie@salleylawfirm.com); [Noelle Manganello](#); [Kelley Leddy](#); [Bill Padget](#); [Margaret A. Collins, Attorney](#); [Law clerk](#); [kelly@salleylawfirm.com](mailto:kelly@salleylawfirm.com); [Lizzy Moore](#)  
**Subject:** RE: Owens v. Mountain Air, 2020-000054  
**Date:** Thursday, September 10, 2020 3:10:53 PM  
**Attachments:** [image001.png](#)  
[initial reply brief SM \(combined\).pdf](#)

---

Sir or Madam:

Attached for filing is the appellant's reply brief to Respondent South Market's brief. Please file the same and return a file stamped copy to me.

Thank you.

**Drew Radeker**



923 Calhoun Street,  
Columbia, South Carolina 29201  
Post Office Box 50143,  
Columbia, South Carolina 29250  
Telephone: (803) 779-2211  
Facsimile: (803) 779-6700  
[www.harrisonfirm.com](http://www.harrisonfirm.com)

*This e-mail message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call us (collect) at (803) 779-2211 and ask to speak with the message sender. Also, we would appreciate your forwarding the message back to us and deleting it from your system. Any tax information or written tax advice contained herein (including any attachments) is not intended to be and cannot be used by any taxpayer for the purpose of avoiding tax penalties that may be imposed on the taxpayer. (The foregoing legend has been affixed pursuant to U.S. Treasury Regulations governing tax practice.) Thank you.*

---

**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Sent:** Monday, August 31, 2020 12:13 PM  
**To:** Drew Radeker <Drew@harrisonfirm.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Rhonda Schaub <Rhonda@harrisonfirm.com>; debbie@salleylawfirm.com; Noelle Manganello <NManganello@FinkelLaw.com>; Kelley Leddy <kleddy@finkellaw.com>; Bill Padget <bpadget@FinkelLaw.com>; Margaret A. Collins, Attorney <meg@pslawsc.com>; Law clerk <lawclerk@harrisonfirm.com>; kelly@salleylawfirm.com; Lizzy Moore <lizzy@pslawsc.com>  
**Subject:** RE: Owens v. Mountain Air, 2020-000054

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** Drew Radeker [<mailto:Drew@harrisonfirm.com>]

**Sent:** Monday, August 31, 2020 12:02 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Rhonda Schaub <[Rhonda@harrisonfirm.com](mailto:Rhonda@harrisonfirm.com)>; [debbie@salleylawfirm.com](mailto:debbie@salleylawfirm.com); Noelle Manganello <[NManganello@FinkelLaw.com](mailto:NManganello@FinkelLaw.com)>; Kelley Leddy <[kledddy@finkellaw.com](mailto:kledddy@finkellaw.com)>; Bill Padget <[bpadget@FinkelLaw.com](mailto:bpadget@FinkelLaw.com)>; Margaret A. Collins, Attorney <[meg@pslawsc.com](mailto:meg@pslawsc.com)>; Law clerk <[lawclerk@harrisonfirm.com](mailto:lawclerk@harrisonfirm.com)>; [kelley@salleylawfirm.com](mailto:kelley@salleylawfirm.com); Lizzy Moore <[lizzy@pslawsc.com](mailto:lizzy@pslawsc.com)>

**Subject:** RE: Owens v. Mountain Air, 2020-000054

Sir or Madam:

Attached for filing is a motion for extension of time. Please file the same and return a file stamped copy to me.

Thank you.

**Drew Radeker**



923 Calhoun Street,  
Columbia, South Carolina 29201  
Post Office Box 50143,  
Columbia, South Carolina 29250  
Telephone: (803) 779-2211  
Facsimile: (803) 779-6700  
[www.harrisonfirm.com](http://www.harrisonfirm.com)

*This e-mail message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call us (collect) at (803) 779-2211 and ask to speak with the message sender. Also, we would appreciate your forwarding the message back to us and deleting it from your system. Any tax information or written tax advice contained herein (including any attachments) is not intended to be and cannot be used by any taxpayer for the purpose of avoiding tax penalties that may be imposed on the taxpayer. (The foregoing legend has been affixed pursuant to U.S. Treasury Regulations governing tax practice.) Thank you.*

---

**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Sent:** Monday, August 24, 2020 4:44 PM

**To:** Drew Radeker <[Drew@harrisonfirm.com](mailto:Drew@harrisonfirm.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Rhonda Schaub <[Rhonda@harrisonfirm.com](mailto:Rhonda@harrisonfirm.com)>; [debbie@salleylawfirm.com](mailto:debbie@salleylawfirm.com); Noelle Manganello <[NManganello@FinkelLaw.com](mailto:NManganello@FinkelLaw.com)>; Kelley Leddy <[kledddy@finkellaw.com](mailto:kledddy@finkellaw.com)>; Bill Padget <[bpadget@FinkelLaw.com](mailto:bpadget@FinkelLaw.com)>; Margaret A. Collins, Attorney <[meg@pslawsc.com](mailto:meg@pslawsc.com)>; Law clerk <[lawclerk@harrisonfirm.com](mailto:lawclerk@harrisonfirm.com)>; [kelley@salleylawfirm.com](mailto:kelley@salleylawfirm.com); Lizzy Moore <[lizzy@pslawsc.com](mailto:lizzy@pslawsc.com)>

**Subject:** RE: Owens v. Mountain Air, 2020-000054: Respondent South Markets Motion to Extend and Brief

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** Drew Radeker [<mailto:Drew@harrisonfirm.com>]  
**Sent:** Monday, August 24, 2020 4:27 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Rhonda Schaub <[Rhonda@harrisonfirm.com](mailto:Rhonda@harrisonfirm.com)>; [debbie@salleylawfirm.com](mailto:debbie@salleylawfirm.com); Noelle Manganello <[NManganello@FinkelLaw.com](mailto:NManganello@FinkelLaw.com)>; Kelley Leddy <[kleddy@finkellaw.com](mailto:kleddy@finkellaw.com)>; Bill Padget <[bpadget@FinkelLaw.com](mailto:bpadget@FinkelLaw.com)>; Margaret A. Collins, Attorney <[meg@pslawsc.com](mailto:meg@pslawsc.com)>; Law clerk <[lawclerk@harrisonfirm.com](mailto:lawclerk@harrisonfirm.com)>; [kelly@salleylawfirm.com](mailto:kelly@salleylawfirm.com); Lizzy Moore <[lizzy@pslawsc.com](mailto:lizzy@pslawsc.com)>  
**Subject:** RE: Owens v. Mountain Air, 2020-000054: Respondent South Markets Motion to Extend and Brief

Sir or Madam:

Attached hereto for filing is the appellant's initial brief in reply to Respondent Caldera. Please file the same and return a file-stamped copy.

Thank you.

**Drew Radeker**



923 Calhoun Street,  
Columbia, South Carolina 29201  
Post Office Box 50143,  
Columbia, South Carolina 29250  
Telephone: (803) 779-2211  
Facsimile: (803) 779-6700  
[www.harrisonfirm.com](http://www.harrisonfirm.com)

*This e-mail message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call us (collect) at (803) 779-2211 and ask to speak with the message sender. Also, we would appreciate your forwarding the message back to us and deleting it from your system. Any tax information or written tax advice contained herein (including any attachments) is not intended to be and cannot be used by any taxpayer for the purpose of avoiding tax penalties that may be imposed on the taxpayer. (The foregoing legend has been affixed pursuant to U.S. Treasury Regulations governing tax practice.) Thank you.*

---

**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Sent:** Thursday, August 20, 2020 1:42 PM  
**To:** Lizzy Moore <[lizzy@pslawsc.com](mailto:lizzy@pslawsc.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Drew Radeker <[Drew@harrisonfirm.com](mailto:Drew@harrisonfirm.com)>; Rhonda Schaub <[Rhonda@harrisonfirm.com](mailto:Rhonda@harrisonfirm.com)>; [debbie@salleylawfirm.com](mailto:debbie@salleylawfirm.com); Noelle Manganello <[NManganello@FinkelLaw.com](mailto:NManganello@FinkelLaw.com)>; Kelly A. Seabrook <[Kelly@seabrooklaw.com](mailto:Kelly@seabrooklaw.com)>; Bill Padget <[bpadget@FinkelLaw.com](mailto:bpadget@FinkelLaw.com)>; Margaret A. Collins, Attorney <[meg@pslawsc.com](mailto:meg@pslawsc.com)>; Law clerk <[lawclerk@harrisonfirm.com](mailto:lawclerk@harrisonfirm.com)>  
**Subject:** RE: Owens v. Mountain Air, 2020-000054: Respondent South Markets Motion to Extend and Brief

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

---

**From:** Lizzy Moore [<mailto:lizzy@pslawsc.com>]

**Sent:** Thursday, August 20, 2020 1:24 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Drew Radeker <[Drew@harrisonfirm.com](mailto:Drew@harrisonfirm.com)>; Rhonda Schaub <[Rhonda@harrisonfirm.com](mailto:Rhonda@harrisonfirm.com)>;  
[debbie@salleylawfirm.com](mailto:debbie@salleylawfirm.com); Noelle Manganello <[NManganello@FinkelLaw.com](mailto:NManganello@FinkelLaw.com)>; Kelly A. Seabrook  
<[Kelly@seabrooklaw.com](mailto:Kelly@seabrooklaw.com)>; Bill Padget <[bpadget@FinkelLaw.com](mailto:bpadget@FinkelLaw.com)>; Margaret A. Collins, Attorney  
<[meg@pslawsc.com](mailto:meg@pslawsc.com)>; Law clerk <[lawclerk@harrisonfirm.com](mailto:lawclerk@harrisonfirm.com)>

**Subject:** Owens v. Mountain Air, 2020-000054: Respondent South Markets Motion to Extend and Brief

Good Afternoon:

Attached, please find a Motion to Extend Time as well as the Initial Brief of Respondent South Market.

Should you need anything further, please let us know.

Sincerely,

**Lizzy Moore** | *Associate Attorney*

2241 Bush River Road, Columbia, SC 29210

P.803.708.7442 | F.803.753.9352 | [lizzy@pslawsc.com](mailto:lizzy@pslawsc.com)

[www.pslawsc.com](http://www.pslawsc.com)

Confidentiality Notice:

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone ([803.708.7442](tel:803.708.7442)) or by replying to this e-mail and deleting all copies of this message. Your assistance is appreciated.

To ensure compliance with the requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including the attachments) is not intended or written to be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or tax-related matter[s].

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.