

# EPTING & RANNIK, LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

November 13, 2020

**RECEIVED**

NOV 16 2020

S.C. SUPREME COURT

**VIA FEDEX**

The Honorable Daniel E. Shearouse  
Clerk of Court, The Supreme Court of South Carolina  
1231 Gervais Street  
Columbia, SC 29201

RE: *J. Daniel Mahoney v. The Muhler Company, Inc. and Henry M. Hay, III, in his individual capacity*  
Appellate Case No.: 2020-000370

Dear Mr. Shearouse:

Enclosed for filing please find the following:

Ten (10) bound copies of the Brief of Petitioner;  
Ten (10) bound copies of the Appendix; and  
Proof of Service.

With kindest regards,

EPTING & RANNIK, LLC

*s/ Angela*

Angela Gross  
Legal Assistant to Jaan G. Rannik

/agg

Enclosures as stated  
cc: Clay McCullough, Esq. (w/enc.)

The State of South Carolina  
In the Supreme Court

---

RECEIVED

NOV 16 2020

S.C. SUPREME COURT

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas for the Ninth Circuit

The Honorable Bentley Price, Circuit Court Judge

---

Case No. 2019-CP-10-00178  
Appellate Case No. 2019-001237

---

J. DANIEL MAHONEY.....Respondent,

v.

THE MUHLER COMPANY, INC. and HENRY M. HAY, III, in his individual capacity,  
Defendants/Appellants..... Petitioners.

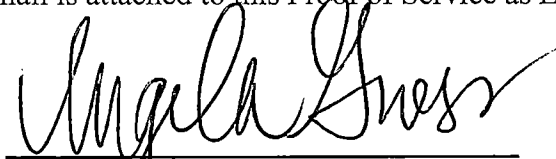
---

PROOF OF SERVICE

---

I certify that I have served the Brief of Petitioner and Appendix opposing counsel via e-mail, on November 12, 2020, addressed to Respondent's attorney of record, Clay McCullough, Esq., at [clay@mklawsc.com](mailto:clay@mklawsc.com). A copy of the e-mail is attached to this Proof of Service as Exhibit A.

By



Angela Gross  
Legal Assistant to  
Jaan G. Rannik, Esq.  
46A State Street, Charleston, SC 29401  
Phone: 843-377-1871; Fax: 843-377-1310

## Angela Gross

---

**From:** Angela Gross  
**Sent:** Thursday, November 12, 2020 2:33 PM  
**To:** Clayton B. McCullough, Esquire  
**Cc:** Jeffrey Domanico; Andrew K. Epting; Jaan Rannik; Katie Nacy  
**Subject:** J. Daniel Mahoney v. The Muhler Company, Inc. and Henry Hay, III /Appeal 2020-000370  
**Attachments:** 2020 11 12 - Petitioners' Brief.pdf

Clay,

Attached for service please find Petitioner's Brief in the above-referenced appeal which is being filed with the South Carolina Supreme Court through the AIS e-filing system today.

*Angela*

Angela Gross  
Legal Assistant to Andrew K. Epting, Jr., Esquire  
Jaan G. Rannik, Esquire  
EPTING & RANNIK, LLC  
46A State Street  
Charleston, SC 29401  
Telephone: (843) 377-1871  
Facsimile: (843) 377-1310  
[agg@epting-law.com](mailto:agg@epting-law.com)

