



CRAWFORD & VON KELLER, LLC

June 10, 2021

South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RECEIVED

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SC Court of Appeals

RE: Jacquita Funchess v. Glenfield Apartments
C/A No. : 2020-000405
Our File No. : 3544.0012

Dear Court of Appeals:

Attorneys for Respondent received the Record on Appeal from Appellant on June 9, 2021. After reviewing the Record on Appeal mailed by Appellant, we are unable to complete and submit our Final Brief due to the ongoing issues with pagination on the Record on Appeal submitted by the Appellant.

The Index does not match with the documents provided in the Record on Appeal. The Index states the Order of March 3, 2020 would be bates stamped page 1 of the Record on Appeal with the bates stamp at the bottom center of the page. However, the actual document on bates stamped page 1 is the Notice of Appeal. The Index states the Motion to Dismiss would be bates stamped page 3 of the Record on Appeal. However, the actual document on bates stamped page 3 is the Form 4 from Judge Maite Murphy. The Index states the Notice of Appeal would be bates stamped page 4 of the Record on Appeal. However, the actual document on bates stamped page 4 is the Certificate of Service dated March 3, 2020. The Index states the Certificate of Service would be bates stamped page 5 of the Record on Appeal. However, the actual document on bates stamped page 5 is the signature page for the Court Reporter for the transcript of a Circuit Court hearing. Finally, The Index states the Respondent Records Request would be bates stamped page 17 of the Record on Appeal. However, the actual document on bates stamped page 17 is an additional copy of the Certificate of Service dated March 3, 2020.

In addition, in her Record on Appeal, Appellant attaches the transcript from the Motion to Dismiss hearing which was held in Circuit Court. However, the transcript is sprinkled throughout the Record on Appeal and is neither complete nor in order.

I am unable to prepare my Final Brief with the confusion and continued failure of Appellant to properly paginate the Record on Appeal.

Sincerely,

Christopher B. Lusk