

**From:** [Rob Varnado](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Lauren Williams](#); [Russell Patterson](#)  
**Subject:** 2020-1168 / NCP Pilgrim v. Clancy  
**Date:** Friday, June 18, 2021 4:53:34 PM  
**Attachments:** final ROA - 6.18.21.pdf

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Good afternoon:

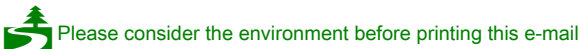
Attached please find another copy of the ROA which has corrected the problems in the last two.

Can you please let me know if you need a Motion for the same, and whether the parties need to Move for continuances on submitting the final briefs, or whether you will please do an order for the same!

Thank you and best regards,

Rob

Robert B. Varnado  
S.C. Bar No. 7085  
Varnado Law Firm, LLC  
36 Broad Street, Suite 200  
P.O. Box 387 (29402)  
Charleston, SC 29401  
(843) 737-7301 Direct  
(843) 670-1826 Cell – Voice-Mail Not Enabled  
[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)



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**From:** Rob Varnado  
**Sent:** Friday, June 18, 2021 4:20 PM  
**To:** 'Lauren Williams' <lauren@russellpattersonlaw.com>  
**Cc:** Russell Patterson <russell@russellpattersonlaw.com>  
**Subject:** RE: 2020-1168

Thank you so much, Lauren!

Rob

---

**From:** Lauren Williams <[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)>  
**Sent:** Friday, June 18, 2021 4:19 PM  
**To:** Rob Varnado <[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)>  
**Cc:** Russell Patterson <[russell@russellpattersonlaw.com](mailto:russell@russellpattersonlaw.com)>  
**Subject:** Re: 2020-1168

Rob,

This version appears to be correct.

Thank you,

Lauren P. Williams  
Associate Attorney  
Russell P. Patterson P. A.  
P. O. [Box 8047](#)  
[HHI SC 29938](#)  
Ph: [843-341-9300](tel:843-341-9300)  
Fax: [843-341-9301](tel:843-341-9301)  
E-Mail: [lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)  
Street Address: [19 Shelter Cove Lane, Suite 107 Watersedge](#) @ Shelter Cove, HHI [SC 29928](#)

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On Jun 18, 2021, at 4:01 PM, Rob Varnado <[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)> wrote:

Lauren:

Thanks for your reminder.

Please look this over and make sure it corrects the inconsistencies of the last one!

Rob

From: Lauren Williams <[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)>  
Sent: Friday, June 18, 2021 12:52 PM  
To: Rob Varnado <[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)>  
Cc: Russell Patterson <[russell@russellpattersonlaw.com](mailto:russell@russellpattersonlaw.com)>  
Subject: RE: 2020-1168

Rob,

I am following up on the status of the corrected ROA. Please let me know when you intend to file same.

Thank you,

Lauren P. Williams  
Associate Attorney  
Russell P. Patterson P. A.  
P. O. Box 8047  
HHI SC 29938  
Ph: 843-341-9300  
Fax: 843-341-9301  
E-Mail: [lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)<<mailto:lauren@russellpattersonlaw.com>>  
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and all copies.

From: Rob Varnado <[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)<<mailto:rvarnado@brown-varnado.com>>>  
Sent: Friday, June 11, 2021 11:59 AM  
To: Lauren Williams  
<[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)<<mailto:lauren@russellpattersonlaw.com>>>  
Cc: Russell Patterson  
<[russell@russellpattersonlaw.com](mailto:russell@russellpattersonlaw.com)<<mailto:russell@russellpattersonlaw.com>>>  
Subject: RE: 2020-1168

It is. Im sorry. I thought I had added it ; when I repaginated it must have changed it back. I will so it again immediately after lunch. Rob

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Lauren Williams  
<[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)<<mailto:lauren@russellpattersonlaw.com>>>  
Date: 6/11/21 11:43 AM (GMT-05:00)  
To: Rob Varnado <[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)<<mailto:rvarnado@brown-varnado.com>>>  
Cc: Russell Patterson  
<[russell@russellpattersonlaw.com](mailto:russell@russellpattersonlaw.com)<<mailto:russell@russellpattersonlaw.com>>>  
Subject: RE: 2020-1168

Rob,

This version is still missing Plaintiff's Trial Exhibit 1. Page 485 is still a duplicate of Defendant's Exhibit 2 instead of Plaintiff's Exhibit 1.

Thank you,

Lauren P. Williams  
Associate Attorney  
Russell P. Patterson P. A.  
P. O. Box 8047  
HHI SC 29938  
Ph: 843-341-9300  
Fax: 843-341-9301  
E-Mail: [lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)<<mailto:lauren@russellpattersonlaw.com>>

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From: Rob Varnado <[rvarnado@brown-varnado.com](mailto:rvarnado@brown-varnado.com)<<mailto:rvarnado@brown-varnado.com>>>  
Sent: Thursday, June 10, 2021 4:38 PM  
To: Court Of Appeals Filings  
<[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)<<mailto:ctappfilings@sccourts.org>>>  
Cc: Lauren Williams  
<[lauren@russellpattersonlaw.com](mailto:lauren@russellpattersonlaw.com)<<mailto:lauren@russellpattersonlaw.com>>>; Russell Patterson  
<[russell@russellpattersonlaw.com](mailto:russell@russellpattersonlaw.com)<<mailto:russell@russellpattersonlaw.com>>>  
Subject: 2020-1168

Good afternoon:

Here is the my amended (corrected) ROA that addresses the omitted document which Ms. Williams discovered in the above-email.

I ask that this ROA be substituted; if we need to file a motion please advise.

Thank you very much,

Rob

Robert B. Varnado  
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<ZZZ - ROA final for counsel to review.pdf>