

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Aug 13 2021**

**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Master-In-Equity

Hon. Deadra L. Jefferson, Circuit Court Judge  
Hon. Mikell R. Scarborough, Master-In-Equity

Case No. 2016-CP-10-2955

Appellate Case No. 2021-000272

TCC of Charleston, Inc., Appellant/Respondent,

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, Edward T. Strom, 304 Concord & Cumberland, LLC, Marion M. Simpson f/k/a Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam, Respondents,

Of Which Concord & Cumberland HPR is the Respondent/Appellant.

**PROOF OF SERVICE**

I, F. Cordes Ford IV, certify that I have served the foregoing **RESPONDENT/APPELLANT'S MOTION TO STRIKE** on all other parties to this matter via electronic mail on August 13, 2021, addressed to their attorneys of record as follows, as evidenced by Exhibit "A" attached hereto:

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Charleston, South Carolina  
Dated: August 13, 2021

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**Cc:** [Walden, Andrew](#); [Grimball, Henry](#); [Ford, Cordes](#); [Casey, Carol](#)  
**Subject:** TCC of Charleston, Inc. v. Concord & Cumberland HPR; Motion to Strike; Case No. 2016-cp-10-2955; Appellate Case No. 2021-000272  
**Date:** Friday, August 13, 2021 3:18:13 PM  
**Attachments:** [Letter to Counsel serving Motion to Strike.pdf](#)  
[Respondent-appellant-Motion to Strike.pdf](#)  
[image17554c.PNG](#)  
[imagec2c2e.PNG](#)  
[image8f1928.PNG](#)  
[image76b10d.PNG](#)

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Counsellors:

Please find attached correspondence from Cordes Ford serving upon you Respondent/Appellants' Motion to Strike in the referenced matter.

Best regards,

**Robin R. Herron**  
Legal Practice Assistant  
Womble Bond Dickinson (US) LLP

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**EXHIBIT A**