

RECEIVED

Aug 31 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

Case No. 2019-CP-04-00752

Appellate Case No. 2020-000182

Robert Ayers, Paul Barkal, Susan Barkal, Gloria Bennett, Kurt Blaettler, Vandy Kim, Glenn Kornett, Gudrun Kornett, David Larson, Lucye Larson, Florence Lince, Mike Lince, Michael McGraw, Diane Bernat, and William Schaidle,

Plaintiffs / Respondents,

v.

Chris Dixon; Samuel J. Dixon; Black Harbor Wealth Management, LLC; Faw Casson & Co.,
LLP; Shurwest, LLC; and Pacific Life Insurance Company,

Of whom Shurwest, LLC is the Appellant.

and

Shurwest, LLC,

Third-Party Plaintiff / Appellant,

v.

MJSM Financial, LLC and Melanie Schulze-Miller,

Third-Party Defendant / Respondent.

And

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

Case No. 2019-CP-04-02151

Appellate Case No. 2020-000187

William and Karen Rich,
Plaintiffs / Respondents,

v.

J. Christopher Dixon; Christopher J. Dixon; Black Harbor Wealth Management, LLC; and
Shurwest, LLC,

Of whom Shurwest, LLC is the Appellant.

and

Shurwest, LLC,

Third-Party Plaintiff / Appellant,

v.

MJSM Financial, LLC and Melanie Schulze-Miller,

Third-Party Defendant / Respondent.

And

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge

Case No. 2019-CP-04-00479

Appellate Case No. 2020-000188

Elizabeth Billings, Pamela Bott, Devon and Barbara Corley, Thomas Dantzler, Jane Downing, Thomas and Laura Eliason, Dennis Ellis, Bobby Floyd, Steven Ganley, Stanley Hix, Suzanne Hofford, Robert Johnson, Jerome and Robin Karnowski, Jerry and Kerry Kelley, Christine Lawson, Robert Manning, Diane Mayfield, Kelley McGraw Gray, Jeff Mitchell, Fred Myette, Mary Orem, Drucilla Perry, Dennis and Maxine Pierson, “Dennis and Maxine Pierson Living Trust,” Earl Switzer, Alan Weeks, John and Mary Wendorf, and Virginia Howard,

Plaintiffs / Respondents,

v.

Chris Dixon; Black Harbor Wealth Management, LLC; Faw Casson & Co., LLP; and Shurwest, LLC,

Of whom Shurwest, LLC is the Appellant.

and

Shurwest, LLC,

Third-Party Plaintiff / Appellant,

v.

MJSM Financial, LLC and Melanie Schulze-Miller,

Third-Party Defendant / Respondent.

PROOF OF SERVICE

I certify that a true copy of the Final Brief of Plaintiffs/Respondents, Certificate of Compliance, and Motion to Expedite in this case has been served on the following, this 31st day of August, 2021, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262, SCACR.

Counsel Served: **E-Mail**

I.S. Leevy Johnson – islj@jtbpa.com
Johson Toal & Battiste, PA
PO Box 1431
Columbia, SC 29202
Counsel for Shurwest, LLC

Benjamin Edward Nicholson, V – nnicholson@burr.com
Burr & Forman LLP
PO Box 11390
Columbia, SC 29211
Counsel for Shurwest, LLC

Charles A. Kinney, Jr. – ckinney@collinsandlacy.com
Collins & Lacy, PC
1330 Lady Street, 6th Floor
Columbia, SC 29201
Counsel for Black Harbor Wealth Management, LLC; Chris Dixon; and Samuel J. Dixon

Jonathan David Klett – jklett@hsblawfirm.com
James Derrick Quattlebaum – dqattlebaum@hsblawfirm.com
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville, SC 29602
Counsel for Pacific Life Insurance Company

Deborah B. Barbier – dbb@deborahbarbier.com
Deborah B. Barbier, LLC
1811 Pickens Street
Columbia, SC 29201
Counsel for Melanie Schulz-Miller and MJSM Financial, LLC

David W Overstreet – david@earhartoverstreet.com
Michael B. McCall – mike@earhartoverstreet.com
Joshua Hugh Umbarger – josh@earhartoverstreet.com
Earhart Overstreet, LLC

PO Box 22528
Charleston, SC 29413
Counsel for Faw Casson and Co., LLP

s/ Shanon N. Peake
Shanon N. Peake (S.C. Bar #102723)
Smith Robinson Holler DuBose and Morgan, LLC
2530 Devine Street, Third Floor
Columbia, South Carolina 29205
(803) 254-5445

Attorney for Plaintiffs/Respondents

August 31, 2021.

From: [Shanon Peake](#)
To: islj@jtbpa.com; nnicholson@burr.com; ckinney@collinsandlacy.com; jklett@hsblawfirm.com; [Deborah Barbier](#); dquattlebaum@hsblawfirm.com; david@earhartoverstreet.com; mike@earhartoverstreet.com; josh@earhartoverstreet.com
Cc: [Robert Rikard](#); [Jeremy Hodges](#); [Angel Shaw](#); [Jon Robinson](#)
Subject: Appellate Case No. 2021-000182: Plaintiffs/Respondents Final Brief and Motion to Expedite
Date: Tuesday, August 31, 2021 11:15:00 AM
Attachments: [Individual Respondents Final Brief with COC, 1.pdf](#)
[Proof of Service - RFB and Mtn Expedite, 4.pdf](#)
[Motion to Expedite, 3.pdf](#)
[2021.08.31 Ltr Ct App re filing fee, 2.pdf](#)

Good Morning,

Please find attached the Individual Respondents' Final Brief, Motion to Expedite, Proof of Service that we are filing with the Court of Appeals today.

Thank you,
Shanon

SMITH ROBINSON
Forward thinking. Results driven.
Smith Robinson Holler DuBose and Morgan, LLC
www.SmithRobinsonLaw.com

Shanon Peake
Attorney at Law

E: shanonp@smithrobinsonlaw.com **Columbia Office**
P: 803.254.5445 2530 Devine Street
D: 803.704.1102 Columbia, SC 29205
F: 803.254.5007

CONFIDENTIALITY NOTICE: The information transmitted, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.