



Although the referenced motion was designated as a “Joint Motion,” the undersigned did not join the motion or authorize the use of his electronic signature on same. On July 29, 2021, Respondent notified Taillon of its intent to move to amend the caption. The following day, Taillon confirmed that she would not oppose such motion. On August 30, 2021, at 5:15 p.m., Respondent sent the undersigned an email requesting consent to file a proposed Joint Motion to amend the caption and obtain a two-month extension for Respondent’s Initial Brief. The next morning, August 31, 2021, without awaiting a response to his email, Respondent filed the purported Joint Motion. The undersigned had not had time to consult with his client and did not consent to the Joint Motion or the use of his signature.

Taillon does not oppose the relief sought in the Joint Motion, either as to the amendment of the caption or the two-month extension. Nevertheless, Taillon objects to the inaccurate representation to the Court that she joined the motion and the undersigned objects to the use of his signature without authorization.

August 31, 2021

/s Jeffrey P. Dunlaevy  
Jeffrey P. Dunlaevy (SC Bar No. 19678)  
Dunlaevy Law Firm  
37 Villa Road, Suite 440  
Greenville SC 29615  
864.208.9305  
Counsel for Appellant Kathryn Taillon

**RECEIVED**

**Aug 31 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Jean Hoefler Toal, Chief Justice of the  
South Carolina Supreme Court (Retired),  
Acting as Circuit Court Judge

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Case No. 2008-CP-23-3665

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William F. Tomz and Francis W. Tomz,  
Individually and as Class Representatives, Respondents,

v.

Capital Investment Funding, and  
Arthur M. Field, Defendants,  
Of Whom Arthur M. Field is the Appellant.

In Re: Kathryn Taillon, Appellant.

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PROOF OF SERVICE

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I certify that I have served Kathryn Taillon's Response to "Joint Motion for Amendment of Caption and Extension of Time for Respondents to File Briefs and Designation of Additional Matter" on the below-listed Counsel by electronic mail (copy attached) on August 31, 2021.

August 31, 2021

/s Jeffrey P. Dunlaevy  
Jeffrey P. Dunlaevy (SC Bar No. 19678)  
Dunlaevy Law Firm  
37 Villa Road, Suite 440  
Greenville SC 29615  
864.208.9305

Counsel Served:

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## Jeffrey Dunlaevy

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**From:** Jeffrey Dunlaevy  
**Sent:** Tuesday, August 31, 2021 4:59 PM  
**To:** gconnell@classactlaw.net; scase@butlermeans.com; Rodney@PillsburyFirm.law; gbrandt@hbvlaw.com; Micah Caskey  
**Subject:** Tomz v. CIF et. al. - Taillon Response to Joint Motion to Amend Caption and for Extension  
**Attachments:** Response to Joint Motion.pdf

Dear Counsel:

Please find attached Appellant Kathryn Taillon's Response to "Joint Motion for Amendment of Caption and Extension of Time for Respondents to File Briefs and Designation of Additional Matter."

Respectfully,

Jeff Dunlaevy



***Jeffrey P. Dunlaevy***

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