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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Perry M. Buckner, Circuit Court Judge
R. Markley Dennis, Circuit Court Judge

Appellate Case No. 2021-001029
Civil Action No. 2019-CP-10-03739

Shirley M.B. Williams, individually, and as Personal
Representative of the Estate of Jason Lynn Williams,
deceased,

Respondent,

v.

Lyft, Inc., Lyft Drives South Carolina, Inc., Kaitlyn
Meadows, Defendants

Of whom Lyft, Inc. d/b/a Lyft Drives South Carolina, Inc.
is the

Appellant.

REPLY IN SUPPORT OF MOTION FOR LIMITED REMAND

Respondents' Return acknowledges that Lyft properly perfected its appeal. Moreover, Respondents do not dispute that a limited remand would be appropriate assuming Lyft's pending post-judgment motion was timely served and filed. Instead, the *only* issue raised by Respondents is a hyper-technical argument as to the timeliness of Lyft's Rule 59(e) motion. Lyft e-filed its motion and sent it to the Chief Administrative Judge, the hearing judge, and all counsel on the service deadline of August 30, 2021. As detailed below, Lyft complied with its obligations under the applicable rules and operative administrative orders. Therefore, its motion was both timely served and filed and this Court should grant Lyft's motion for a limited remand.

I. Lyft timely served its motion.

On the record now before this Court, service was proper on the August 30, 2021 deadline. Lyft e-filed its post-judgment motion seeking relief pursuant to Rules 52(b), 59(e), and 60(b) on the evening of August 30, 2021. (*See* Notice of Electronic Filing (“NEF”), attached as **Exhibit A.**) Thus, service was effectuated through the e-filing system upon transmission of the NEF, which stated “Official File Stamp of 8-30-2021 10:12:56 PM.” (*See* Section 4(e)(2), SCEF (noting that the e-filing along with the transmission of the NEF constitutes proper service as to all parties who are e-filers in the case).) That same evening, Lyft also separately emailed a copy of the filing to Chief Administrative Judge Roger Young, hearing Judge R. Markley Dennis, and all counsel of record. (*See* 8/30/2021 email from Attorney Eibling, attached as **Exhibit B.**) Respondents do not dispute that they received this email on August 30, 2021. Additionally, Judge Young’s clerk confirmed the court’s receipt of the motion. (*See* 8/31/2021 email from Michael Secrist, attached as **Exhibit C.**) Therefore, service was also properly effectuated via email.¹

Respondents nevertheless assert that service was not timely made within 10 days of the judgment as required for the Rule 59(e) grounds. Respondents note that the Supreme Court’s coronavirus administrative orders provide that if a document is served by email, the serving party must attach a copy of the email serving the documents to the proof of service. Respondents state that Lyft failed to attach a copy of the email when it served the documents, which rendered service via email ineffective. Lyft, however, could not attach the service email to the email that was itself serving the documents—that was an impossibility. Instead, Lyft properly complied with the administrative order by filing a proof of service attaching a copy of the service email along with

¹ Respondents’ Return concedes that Lyft did properly “serve the circuit court with the August 30, 2021 filing pursuant to 59(g), SCRCF.” (Return at 2.)

the original notice of electronic filing. (*See* Proof of Service, attached as **Exhibit D.**) The coronavirus administrative order did not impose any requirement that a proof of service be sent the same day—all that it stated was “a copy of the sent e-mail shall be enclosed with the proof of service, affidavit of service, or certificate of service for that document.” (*See* Order re: Operation of the Trial Courts During the Coronavirus Emergency (As Amended August 27, 2021), Appellate Case No. 2020-000447.) That is precisely what Lyft did when it filed the proof of service on August 31, 2021.

Lyft e-filed its motion on August 30, 2021, which served it through the e-filing system, and also separately served it via email that same day. Therefore, service was effectuated, and Lyft’s Rule 59(e) arguments are properly before the lower court. Respondents’ argument is without merit.

II. Lyft timely filed its motion.

Rule 5(d) allows five days to file a document following service. *See* Rule 5(d), SCRCPC (noting that all papers “shall be filed with the court within five (5) days after service thereof”). This was accomplished under any measure on August 31, 2021, which Respondents do not dispute.

However, Lyft’s filing was proper on August 30, 2021. The morning of August 31, 2021, the Clerk of Court purported to “reject” Lyft’s filing due to an unredacted birthday contained on one page of one exhibit in the 400 plus page filing. This was error. The e-filing guidelines provide that where the Clerk of Court “discovers unredacted personal identifying information in an E-Filed document,” she “*may* require that the party E-File an *amended* document that properly redacts personal identifying information.” (Section 10(b)(2), SCEF.) The guidelines do not permit the Clerk to reject a document outright on this basis.

Here, instead of alerting Lyft’s counsel to the issue and permitting filing of an amended document, the Clerk of Court proceeded to “reject” the filing entirely. In fact, the Clerk gave no indication that the filing would be rejected prior to issuing the rejection notice. This forced Lyft to re-file the entire motion and exhibits, which resulted in the filed-stamped version of the motion showing August 31, 2021 as the “filed” date.

The Clerk of Court exceeded her authority in rejecting Lyft’s initial filing. As the Supreme Court recently reminded the Clerks of Court, they have a “ministerial duty to docket filings *irrespective of potential procedural flaws that may exist.*” *Barnes v. State*, 433 S.C. 399, 859 S.E.2d 260, 261 (2021) (emphasis added). Moreover, “[t]his duty *is not discretionary,*” and the clerks do not have the authority to “reject a filing based on ostensible or perceived failures, including whether the document is contained on the proper form.” *Id.*; *see also id.* (“In the absence of an order from a judge, [clerks] may not refuse to accept a notice of appeal, even if they believe that no appeal is available or that the notice is untimely or otherwise defective.” (quoting *Gorod v. Tabachnick*, 696 N.E.2d 547, 548 (Mass. 1998))).

The *Barnes* court reiterated that if the Clerk does not believe a document is in proper form, the power to reject it lies with a judge, not the clerk. Thus, “the clerk *shall accept* the filing, thereby permitting the court to decide any issues the parties may have with it.” *Id.* (emphasis added).

Here, the Clerk of Court exceeded the scope of her purely ministerial duty by rejecting Lyft’s filing due to an exhibit containing one unredacted personal identifier.² The proper service

² Even if the “rejection” had been within the scope of the Clerk’s authority, which it was not, the e-filing rules state that if a document is “rejected by the clerk of court and is therefore untimely, the party may seek appropriate relief from the court upon good cause shown, such as when the clerk of court erroneously rejected a filing or where a rejection was based on improper formatting.” Section 4(d)(2), SCEF. This guideline also supports the propriety of remand under these facts, as

and filing date was August 30, 2021, and the Clerk of Court erred by refusing to permit Lyft to file an amended exhibit correcting the redaction issue. Had the Clerk done so, it would have preserved the correct date on the filed-stamped document. Instead, the Clerk erred by unilaterally rejecting the document and forcing Lyft to re-file. Lyft's filing was not rendered untimely as a result of the Clerk of Court's error.

III. The other relief sought by Lyft's motion was indisputably timely.

Lastly, Rule 59(e) is the only relief sought by Lyft that required "service" of a motion within 10 days. Lyft's motion also requested relief pursuant to Rules 52(b) and Rule 60(b), neither of which has a 10 days service requirement. *See* Rule 52(b), SCRCPP (noting only that a "motion" be "made" within 10 days of the judgment); Rule 60(b), SCRCPP (providing that a motion must be made within a "reasonable time" but not more than one year after judgment for the type of relief sought by Lyft). Respondents have not asserted that those portions of the motion were untimely. Thus, regardless of the timeliness of service of the 59(e) grounds, the Rule 52(b) and Rule 60(b) grounds are properly before the lower court and it did not lose jurisdiction to address them. Limited remand is appropriate to permit the lower court to rule on those issues independently of and in addition to the Rule 59(e) issue.

IV. The Court should grant a limited remand.

For all these reasons, a limited remand is appropriate. Lyft's motion was timely served and filed on August 30, 2021 in compliance with the applicable rules and administrative orders. Therefore, Lyft's motion in its entirety is properly before the lower court for consideration, and this Court should remand to allow that court to address all the issues raised therein, including the

the lower court is the proper forum for determining if the filing was, in fact, untimely and, if so, whether Lyft has shown good cause for relief.

grounds asserted under Rule 52(b) and Rule 60(b) to which Respondents have not raised and cannot raise any objection as to timeliness of service or filing.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: s/A. Mattison Bogan

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Suite 600
Charleston, SC 29401

Attorneys for Defendant Lyft, Inc. d/b/a Lyft Drives South Carolina, Inc. (incorrectly identified in the Complaint and case caption as separate corporate entities Defendant Lyft, Inc. and Defendant Lyft Drives South Carolina, Inc.)

Columbia, South Carolina
October 4, 2021

Exhibit A



***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2019CP1003739

Official File Stamp: 08-30-2021 10:12:56 PM
Court: CIRCUIT COURT
Common Pleas
Charleston
Case Caption: Shirley M B Williams , plaintiff, et al VS Lyft Inc , defendant, et al
Document(s) Submitted: Motion/Alter and/or Amend
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
Filed by or on behalf of: Sarah Theresa Eibling

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Chadwick S. Devlin for Lyft Inc, Lyft Drives South Carolina Inc
Duke Raleigh Highfield for Zurich North America Zurich North American Insurance Company
Sarah Theresa Eibling for Lyft Inc, Lyft Drives South Carolina Inc
Scott Douglas MacLatchie, Jr. for Lyft Inc, Lyft Drives South Carolina Inc
Otto Edworth Liipfert, III for Kaitlyn Meadows
Brooklyn Ansley O'Shea for Shirley M B Williams, Williams, Shirley M B as Personal Representative, Jason Lynn Williams, Williams, Jason Lynn Estate of
Karlen Kay Senn for Shirley M B Williams, Williams, Shirley M B as Personal Representative, Jason Lynn Williams, Williams, Jason Lynn Estate of
Marshall (Matt) Taylor Austin for Lyft Inc, Lyft Drives South Carolina Inc

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Government Employees Insurance Company (Uim)
Zurich American Insurance Company

Exhibit B

Jessica Trautman

From: Sarah Eibling <Sarah.Eibling@nelsonmullins.com>
Sent: Monday, August 30, 2021 10:37 PM
To: Dennis, R. Markley Jr. Law Clerk (Alexandra Carlson); Dennis, R. Markley Jr.; Young, Roger Law Clerk (Michael Monastra); Young, Roger Secretary (Robyn R. Hills); candace.dunn@berkeleycountysc.gov
Cc: Brooklyn O'Shea; ian@oshealaw.com; karlen@oshealaw.com; Highfield, Duke; Anderson, Victoria (Tori); melissa@oshealaw.com; Worth Liipfert; Robert Powell; Matt Austin; Chadwick Devlin; Lauri Epstein; Kelli Martin
Subject: FW: c/a 2019-CP-10-03739: Williams v. Lyft - Motion to Alter or Amend filed by Lyft on 8/30/21
Attachments: Rule 52(b) 59(e) and 60(b) Motion.pdf; Ex A - 06.25.21 Damages Hearing Transcript .pdf; Ex B - 2021.04.16 ESI Investigative Report.pdf; Ex C - Deposition of Lt. Matthew Wojslawowicz .pdf; Ex D - Deposition of Kaitlyn Meadows .pdf; Ex E - HaroldWilkin_PDF Tran .pdf; Ex F - Reen Life Care Plan Report .pdf; Ex G - Lyft 12.31.20 Form 10K .pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Judge Dennis and Chief Administrative Judge Young:

Attached please find electronic copies of the filings made today on behalf of Lyft Inc. in the above captioned matter. Hard-copies will be mailed to your respective offices in the morning for Wednesday delivery. We appreciate your time and consideration of the attached.

Please let me know if you have any issue with the attachments. If the electronic version or hard-copy version needs to be sent to a different judge, please advise and we will oblige.

Respectfully,
Sarah T. Eibling



SARAH T. EIBLING **PARTNER**
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1320 MAIN STREET | COLUMBIA, SC 29201
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NELSONMULLINS.COM [VCARD](#) [VIEW BIO](#)

From: Jenny DiTirro <jenny.ditirro@nelsonmullins.com>
Sent: Monday, August 30, 2021 10:23 PM
To: Sarah Eibling <Sarah.Eibling@nelsonmullins.com>; Lauri Epstein <lauri.epstein@nelsonmullins.com>
Subject: RE: 2021.08.25 (Williams) DRAFT Rule 52(b) 59(e) and 60(b) Motion (MERGED) 4847-6773-4264 v.7.docx

As filed copies

JENNY DITIRRO ADMINISTRATIVE ASSISTANT

jenny.ditirro@nelsonmullins.com

1400 WEWATTA STREET | SUITE 500

DENVER, CO 80202

T 303.583.9931 F 303.583.9999

NELSONMULLINS.COM

From: Sarah Eibling <Sarah.Eibling@nelsonmullins.com>

Sent: Monday, August 30, 2021 7:24 PM

To: Jenny DiTirro <jenny.ditirro@nelsonmullins.com>; Lauri Epstein <lauri.epstein@nelsonmullins.com>

Subject: 2021.08.25 (Williams) DRAFT Rule 52(b) 59(e) and 60(b) Motion (MERGED) 4847-6773-4264 v.7.docx

ONE minor minor change to TOC – NOW this one is ready!

Exhibit C

Jessica Trautman

From: Young, Roger Law Clerk (Michael Secrist) <ryounglc@sccourts.org>
Sent: Tuesday, August 31, 2021 10:33 AM
To: Sarah Eibling; Dennis, R. Markley Jr.; candace.dunn@berkeleycountysc.gov; Lisa E. Chapman
Cc: Brooklyn O'Shea; ian@oshealaw.com; karlen@oshealaw.com; Highfield, Duke; Anderson, Victoria (Tori); melissa@oshealaw.com; Worth Liipfert; Robert Powell; Matt Austin; Chadwick Devlin; Lauri Epstein; Kelli Martin
Subject: RE: 2019CP1003739: Williams v. Lyft - Motion to Alter or Amend filed by Lyft on 8/30/21

Received. Thank you Counselor.

Michael E. Secrist

Law Clerk to The Honorable Roger M. Young, Sr.
100 Broad Street
Charleston, South Carolina 29401
Office: (843) 958-2015
Email: RYounglc@sccourts.org

From: Sarah Eibling <Sarah.Eibling@nelsonmullins.com>
Sent: Monday, August 30, 2021 10:37 PM
To: Dennis, R. Markley Jr. Law Clerk (Alexandra Carlson) <MDennisLC@sccourts.org>; Dennis, R. Markley Jr. <MDennisJ@sccourts.org>; Young, Roger Law Clerk (Michael Secrist) <ryounglc@sccourts.org>; Young, Roger Secretary (Robyn R. Hills) <ryoungsc@sccourts.org>; candace.dunn@berkeleycountysc.gov
Cc: Brooklyn O'Shea <brooklyn@oshealaw.com>; ian@oshealaw.com; karlen@oshealaw.com; Highfield, Duke <dhighfield@yclr.com>; Anderson, Victoria (Tori) <TAnderson@yclr.com>; melissa@oshealaw.com; Worth Liipfert <Worth@griffithfreeman.com>; Robert Powell <Rpowell@griffithfreeman.com>; Matt Austin <matt.austin@nelsonmullins.com>; Chadwick Devlin <chadwick.devlin@nelsonmullins.com>; Lauri Epstein <lauri.epstein@nelsonmullins.com>; Kelli Martin <kelli.martin@nelsonmullins.com>
Subject: FW: c/a 2019-CP-10-03739: Williams v. Lyft - Motion to Alter or Amend filed by Lyft on 8/30/21

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

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Please let me know if you have any issue with the attachments. If the electronic version or hard-copy version needs to be sent to a different judge, please advise and we will oblige.

Respectfully,
Sarah T. Eibling



SARAH T. EIBLING PARTNER

sarah.eibling@nelsonmullins.com

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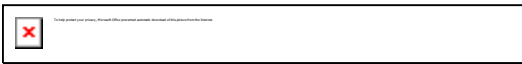
From: Jenny DiTirro <jenny.ditirro@nelsonmullins.com>

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Subject: RE: 2021.08.25 (Williams) DRAFT Rule 52(b) 59(e) and 60(b) Motion (MERGED) 4847-6773-4264 v.7.docx

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# **Exhibit D**

|                                               |   |                               |
|-----------------------------------------------|---|-------------------------------|
| STATE OF SOUTH CAROLINA                       | ) | IN THE COURT OF COMMON PLEAS  |
|                                               | ) | NINTH JUDICIAL CIRCUIT        |
| COUNTY OF CHARLESTON                          | ) | C/A NO. 2019-CP-10-03739      |
|                                               | ) |                               |
| Shirley M. B. Williams, individually, and as  | ) |                               |
| Personal Representative of the Estate of      | ) |                               |
| Jason Lynn Williams, deceased.                | ) |                               |
|                                               | ) | <b>CERTIFICATE OF SERVICE</b> |
| Plaintiff,                                    | ) |                               |
|                                               | ) |                               |
| v.                                            | ) |                               |
|                                               | ) |                               |
| Lyft, Inc., Lyft Drives South Carolina, Inc., | ) |                               |
| Kaitlyn Meadows                               | ) |                               |
|                                               | ) |                               |
| Defendants.                                   | ) |                               |

---

I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Defendant Lyft, Inc. d/b/a Lyft Drives South Carolina, Inc. (incorrectly identified in the Complaint and case caption as separate corporate entities Defendant Lyft, Inc. and Defendant Lyft Drives South Carolina, Inc.), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) referenced via electronic transmission on August 30, 2021. Please see Notice of Electronic Filing dated August 30, 2021 (attached hereto as Exhibit A) and email to Judge Dennis and counsel dated August 30, 2021 (attached hereto as Exhibit B).

Pleadings:                    **MOTION TO ALTER OR AMEND THE AUGUST 19, 2021 ORDER AND FOR RELIEF FROM DEFAULT JUDGMENT**

[signature page to follow]

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: s/ SARAH T. EIBLING \_\_\_\_\_

Sarah T. Eibling  
SC Bar No. 72607  
E-mail: sarah.eibling@nelsonmullins.com  
Chadwick S. Devlin  
SC Bar No. 102229  
E-Mail: chadwick.devlin@nelsonmullins.com  
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Columbia, SC 29201  
(803) 799-2000

Matt Austin  
SC Bar No. 77941  
E-Mail: matt.austin@nelsonmullins.com  
151 Meeting Street  
Suite 600  
Charleston, SC 29401

*Attorneys for Defendant Lyft, Inc. d/b/a Lyft Drives South  
Carolina, Inc. (incorrectly identified in the Complaint and case  
caption as separate corporate entities Defendant Lyft, Inc. and  
Defendant Lyft Drives South Carolina, Inc.)*

Columbia, South Carolina

August 31, 2021

## Matt Austin

---

**From:** efiledonotreply@sccourts.org  
**Sent:** Monday, August 30, 2021 10:17 PM  
**To:** Matt Austin  
**Cc:** marshallaustin@gmail.com; Laurie Jennings  
**Subject:** Courtesy NEF RE: 2019CP1003739

◀External Email▶ - From: efiledonotreply@sccourts.org

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*

### NOTICE OF ELECTRONIC FILING [NEF]

---

**A filing has been submitted to the court RE: 2019CP1003739**

**Official File Stamp:** 08-30-2021 10:12:56 PM  
**Court:** CIRCUIT COURT  
Common Pleas  
Charleston  
**Case Caption:** Shirley M B Williams , plaintiff, et al VS Lyft Inc , defendant, et al  
**Document(s) Submitted:** Motion/Alter and/or Amend  
- Exhibit/Filing of Exhibits  
- Exhibit/Filing of Exhibits  
- Exhibit/Filing of Exhibits  
- Exhibit/Filing of Exhibits  
- Exhibit/Filing of Exhibits  
- Exhibit/Filing of Exhibits  
- Exhibit/Filing of Exhibits  
**Filed by or on behalf of:** Sarah Theresa Eibling

This notice was automatically generated by the Court's auto-notification system.

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#### The following people were served electronically:

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Sarah Theresa Eibling for Lyft Inc, Lyft Drives South Carolina Inc  
Scott Douglas MacLatchie, Jr. for Lyft Inc, Lyft Drives South Carolina Inc  
Otto Edworth Liipfert, III for Kaitlyn Meadows  
Brooklyn Ansley O'Shea for Shirley M B Williams, Williams, Shirley M B as Personal Representative, Jason Lynn Williams, Williams, Jason Lynn Estate of  
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Matt Austin

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To: Dennis, R. Markley Jr. Law Clerk (Alexandra Carlson); Dennis, R. Markley Jr.; Young, Roger Law Clerk (Michael Monastra); Young, Roger Secretary (Robyn R. Hills); candace.dunn@berkeleycountysc.gov
Cc: Brooklyn O'Shea; ian@oshealaw.com; karlen@oshealaw.com; Highfield, Duke; Anderson, Victoria (Tori); melissa@oshealaw.com; Worth Liipfert; Robert Powell; Matt Austin; Chadwick Devlin; Lauri Epstein; Kelli Martin
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Respectfully,
Sarah T. Eibling



SARAH T. EIBLING **PARTNER**
sarah.eibling@nelsonmullins.com
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Subject: RE: 2021.08.25 (Williams) DRAFT Rule 52(b) 59(e) and 60(b) Motion (MERGED) 4847-6773-4264 v.7.docx

As filed copies



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DENVER, CO 80202

T 303.583.9931 F 303.583.9999

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From: Sarah Eibling <Sarah.Eibling@nelsonmullins.com>

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Subject: 2021.08.25 (Williams) DRAFT Rule 52(b) 59(e) and 60(b) Motion (MERGED) 4847-6773-4264 v.7.docx

ONE minor minor change to TOC – NOW this one is ready!

Kelli Martin

From: efiledonotreply@sccourts.org
Sent: Wednesday, September 1, 2021 8:59 AM
To: Sarah Eibling
Cc: Kelli Martin; Laurie Jennings
Subject: Accepted Notice: Your filing, Re: 062616/01501 - (360) Wrongful Death - Service/Certificate Of Service, was accepted

◀External Email▶ - From: efiledonotreply@sccourts.org

To: Sarah Theresa Eibling sarah.eibling@nelsonmullins.com
From: efiledonotreply@sccourts.org
Date: 2021-08-31 17:16:06.257
Subject: Your electronic filing, Re: 062616/01501 - (360) Wrongful Death - Service/Certificate Of Service, was accepted by CIRCUIT COURT.

Case Number: 2019CP1003739

Case Type: (360) Wrongful Death

Document Type: Service/Certificate Of Service

Document Type: Exhibit/Filing of Exhibits

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Reason(s) : (none provided)

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Perry M. Buckner, Circuit Court Judge  
R. Markley Dennis, Circuit Court Judge

Appellate Case No. 2021-001029  
Civil Action No. 2019-CP-10-03739

Shirley M.B. Williams individually, and as Personal  
Representative of the Estate of Jason Lynn Williams,  
deceased, .....

Respondent,

v.

Lyft, Inc., Lyft Drives South Carolina, Inc., Kaitlyn  
Meadows

Of whom Lyft, Inc. d/b/a Lyft Drives South Carolina, Inc.  
is the .....

Appellant.

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**PROOF OF SERVICE**

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I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Defendant Lyft, Inc. d/b/a Lyft Drives South Carolina, Inc. (incorrectly identified in the Complaint and case caption as separate corporate entities Defendant Lyft, Inc. and Defendant Lyft Drives South Carolina, Inc.), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow in accordance with the Supreme Court's August 25, 2021 Administrative Order by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System.

Pleadings: Appellant's Reply In Support of Motion for Limited Remand

Counsel Served:

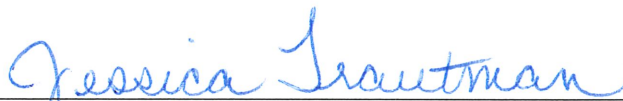
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Jessica Trautman  
Administrative Assistant

Columbia, South Carolina

October 4, 2021

## Jessica Trautman

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**From:** Jessica Trautman  
**Sent:** Monday, October 4, 2021 2:52 PM  
**To:** 'wharrison@mcgowanhood.com'; 'brooklyn@oshealaw.com';  
'worth@griffithfreeman.com'; 'dhighfield@ycrlaw.com'; 'karlen@oshealaw.com'  
**Cc:** Sarah Eibling; Matt Bogan; Matt Austin; Blake Williams  
**Subject:** Williams v. Lyft, Inc. (Appellate Case 2021-001029)  
**Attachments:** 2021.10.04 Williams - Reply in Support of Motion for a Limited Remand.pdf

Dear Counsel,

Attached for service upon you in the above matter please find Appellant's Reply In Support of Motion for Limited Remand and proof of service. Service is made via email pursuant to the Supreme Court's August 25, 2021 Administrative Order.

Thank you.



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