

**From:** [Taylor Rhodes](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Lena Meredith](#); [james@jamesmithpa.com](mailto:james@jamesmithpa.com); [Lena Meredith](#)  
**Subject:** Respondent-Appellant's Return to Petition for Emergency Writ of Supersedeas and Petition to Lift Emergency Stay: IOS, LLC v. Lander University Appellate Case No.: 2021-001400  
**Date:** Wednesday, December 8, 2021 10:23:36 PM  
**Attachments:** Letter to Clerk Court of Appeals Filing Return to Writ of Supersedeas.pdf  
IOSLLC v. Lander University Appellate Certificate of Service for Return to Petition for Writ.pdf  
Affidavit of Counsel for Respondent-Appellant, Lena Y Meredith.pdf  
Response to Petition for Writ of Supersedeas.pdf

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

Good Afternoon,  
This correspondence is being sent on behalf of Lena Meredith.

Dear Court of Appeals Clerk:

Attached please find the Respondent-Appellant's Return to Petition for Emergency Writ of Supersedeas and Petition to Lift The Emergency Stay Granted By Order Dated December 3, 2021. Also attached is an Affidavit of Counsel. The Appellant-Respondent's Petition for Emergency Writ of Supersedeas was received by my office on December 3, 2021. Attached also is our Proof of Service.

I would appreciate your assistance with filing the attached and returning clocked copies. Our firm's check in the amount of \$250.00 to cover the cot of our Cross Appeal as well as Petition to Lift the Stay will be sent by U.S. Mail under separate cover. By copy of this filing, I am serving attorney for the Appellant-Respondent.

Sincerely,  
Lena Y. Meredith  
Nicholson, Meredith & Anderson, LLC

Thanks,  
*Taylor Rhodes*

Taylor Rhodes  
Paralegal  
Nicholson, Meredith & Anderson, LLC  
109 West Court Ave, Greenwood, SC 29646  
P.O. Box 457, Greenwood, SC 29648  
(864) 450-9496 direct  
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(864) 229-2739 fax  
[trhodes@nicholsonmeredith.com](mailto:trhodes@nicholsonmeredith.com)

**\*\*\*In our continued monitoring of state and federal COVID-19 recommendations, we have made the decision to re-open our lobby. We prefer that clients wear masks while in our office unless they have been vaccinated.\*\*\***

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**From:** Taylor Rhodes

**Sent:** Tuesday, December 7, 2021 4:20 PM

**To:** ctappfilings@sccourts.org

**Cc:** Lena Meredith <lena@nicholsonmeredith.com>; Addy, Frank R. Secretary (Freda Sartin) <faddysc@sccourts.org>; Addy, Frank R. Law Clerk (Sydney Case) <faddyjc@sccourts.org>; 'james@jamesmithpa.com' <james@jamesmithpa.com>

**Subject:** Notice of Appeal Cross Appeal IOS, LLC v. Lander University Appellate Case No.: 2021-001400

Good Afternoon,

This correspondence is being sent on behalf of Lena Meredith.

Dear Court of Appeals Clerk:

Attached please find the Respondent-Appellant's, Cross-Appeal from the Order of the Honorable Frank R. Addy, Jr., dated November 2, 2021. The Appellant-Respondent's Notice of Appeal was received by my office on December 3, 2021. Attached also is our Proof of Service of the Notice of Appeal and a copy of the Orders (Order Granting Partial Judgment dated November 2, 2021 and Form 4 Order denying reconsideration dated December 2, 2021) which are being appealed.

The filing fee is being sent by first class US Mail. I would appreciate your assistance with filing the attached and returning clocked copies.

Sincerely,

Lena Y. Meredith

Nicholson, Meredith & Anderson, LLC

Thanks,

*Taylor Rhodes*

Taylor Rhodes

Paralegal

Nicholson, Meredith & Anderson, LLC

109 West Court Ave, Greenwood, SC 29646  
P.O. Box 457, Greenwood, SC 29648  
(864) 450-9496 direct  
(864) 229-7241 office  
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**From:** James Smith <[James@JamesSmithPA.com](mailto:James@JamesSmithPA.com)>  
**Sent:** Friday, December 3, 2021 9:41 AM  
**To:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
**Cc:** Lena Meredith <[lana@nicholsonmeredith.com](mailto:lana@nicholsonmeredith.com)>; Taylor Rhodes <[trhodes@nicholsonmeredith.com](mailto:trhodes@nicholsonmeredith.com)>; Addy, Frank R. Secretary (Freda Sartin) <[faddysc@sccourts.org](mailto:faddysc@sccourts.org)>; Addy, Frank R. Law Clerk (Sydney Case) <[faddylc@sccourts.org](mailto:faddylc@sccourts.org)>  
**Subject:** Notice of Appeal - Filing - IOS, LLC v Lander University 2012-CP-24-0576

Dear Court of Appeals Clerk:

Attached please find for filing with the Court of Appeal in the above-subject matter:

1. Notice of Appeal
2. Lower Court Form 4 Order as referenced in the Notice
3. Lower Court Formal Order as referenced in the Notice, and
4. Appellate Certificate of Service

Filing fee is being sent by first class US mail.

I would appreciate your assistance with filing the attached and returning clocked copies.

Sincerely, James

**James E. Smith, Jr.**  
**James E. Smith, Jr., P.A.**  
Post Office Box 50333  
Columbia, South Carolina 29250-0333  
Telephone (803) 933-9800  
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**JAMES E. SMITH JR., P.A.**  
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