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February 7, 2022

RECEIVED

Feb 07 2022

SC Court of Appeals

Sent via email

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Jeff Quinn vs. Yeamans Hall Club, et al
Appellate Case No.: 2021-000695

Dear The Honorable Ms. Kitchings:

Pursuant to the January 25, 2022, deficiency letter I received from the Court of Appeals, please find attached a copy of emails from attorneys of record for the South Carolina Uninsured Employer's Fund and Travelers Property and Casualty Co. of America reflecting their consent to Respondent Yeamans Hall's filing of an Appendix to the Record on Appeal as required by Rule 212(c), SCACR. I also received verbal consent from the pro se Respondent, Michael Hannaway, who is copied on this correspondence. Pursuant to my phone conversation with LaToyla Burns at the Court of Appeals, Mr. Hannaway's verbal consent is sufficient to satisfy Rule 212(c), SCACR.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your attention on this matter.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

John Gabriel Coggiola

JGC/jgc

Enclosures: Emails from attorneys for Appellant and Respondent Travelers

cc: Mr. Robert M. Cook, II, Esquire (via email)
Mr. Phillip S. Ferderigos, Esquire (via email)
Mr. John W. Fletcher, Esquire (via email)
Mr. John W. Fletcher, Esquire (via email)
Mr. Michael Hannaway (via email)

Gabe Coggiola

From: Robert Cook <robcook1965@yahoo.com>
Sent: Wednesday, February 2, 2022 10:53 AM
To: Gabe Coggiola
Subject: Re: - WCC #1819776 - Jeff Quinn vs. Yeamans Hall Club, et al - AFC230202321 : WCC #1819776 Jeff Quinn vs. Yeamans Hall Club, et al AFC230202321: [EXT] Jeff Quinn vs. Yeamans Hall Club, et al (WCC #1819776)

I absolutely consent.
Let me know if you need anything else.

ROBERT M. COOK II

ATTORNEY AT LAW

The Robert Cook Law Firm, LLC

128 N. Oak St., Batesburg, SC 29006 (physical address)
P.O. Box 3575, Leesville, SC 29070 (mailing address)
803-317-2171 (office); 803-687-7491 (cell)

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On Wednesday, February 2, 2022, 09:36:43 AM EST, Gabe Coggiola <jgcoggiola@wjcbllaw.com> wrote:

Good morning Robert,

I need to send the Court of Appeals a copy of the emails wherein you all consented to my filing an appendix to the Record on Appeal. I know you previously replied that you consent, but I can't seem to place my hands on the email. Could you please reply to this email again confirming that you consent to my filing the appendix to the Record on Appeal to include the Form 51 filed by my client's on 08/07/19? Thank you,

Gabe



John Gabriel Coggiola

Attorney

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phone: 803.227.2884
3600 Forest Drive, Suite 204
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Gabe Coggiola

From: Gabe Coggiola
Sent: Wednesday, January 19, 2022 9:05 AM
To: John W. Fletcher
Subject: RE: WCC #1819776 Jeff Quinn vs. Yeamans Hall Club, et al AFC230202321: [EXT] Jeff Quinn vs. Yeamans Hall Club, et al (WCC #1819776)

Categories: Email Associated to Expert Case

Thank you.



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From: John W. Fletcher <jfletcher@barnwell-whaley.com>
Sent: Wednesday, January 19, 2022 9:04 AM
To: Gabe Coggiola <jgcoggiola@wjcblaw.com>; Randell C. Stoney, Jr. <rstonej@barnwell-whaley.com>; Michael Hannaway <bluehog11@aol.com>
Subject: RE: [EXT] Jeff Quinn vs. Yeamans Hall Club, et al (WCC #1819776)

I consent.

From: Gabe Coggiola <jgcoggiola@wjcblaw.com>
Sent: Wednesday, January 19, 2022 9:01 AM
To: Randell C. Stoney, Jr. <rstonej@barnwell-whaley.com>; John W. Fletcher <jfletcher@barnwell-whaley.com>; Michael Hannaway <bluehog11@aol.com>
Subject: [EXT] Jeff Quinn vs. Yeamans Hall Club, et al (WCC #1819776)

Good morning,

I am following up on the email below. I just need to know if you all will consent to me supplementing the Record on Appeal with the Form 51 filed by my client's on 08/07/19. I have heard back from the Appellant, but need to know if it's ok with you all so I don't have to file a motion with the Court. Can you please reply to this email and let me know if you consent to me supplementing the record? Thank you,
Gabe



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From: Gabe Coggiola

Sent: Monday, January 17, 2022 2:08 PM

To: Randell C. Stoney, Jr. <rstone@barnwell-whaley.com>; John W. Fletcher <jfletcher@barnwell-whaley.com>; Michael Hannaway <bluehog11@aol.com>; 'Robert Cook' <robcook1965@yahoo.com>

Subject: Appellate Case No.: 2021-000695 - Jeff Quinn vs. Yeamans Hall Club, et al (WCC #1819776)

Importance: High

Good afternoon,

In preparing my final brief today, I realized that I failed to include Yeamans Hall's Form 51, dated 08/07/19, which was referenced in my initial brief, but I failed to include in my designation of matter, and therefore it was not included in the Record on Appeal. Pursuant to Rule 212(B), a party can supplement the Record on Appeal at any time prior to the commencement of arguments with the written consent of all parties. Without everyone's consent, I have to move the appellate court for leave in order to do so. Can you all please advise if you consent to me supplementing the Record on Appeal to include Yeamans Hall's attached 08/07/19 Form 51? Thank you,

Gabe



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