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May 25, 2022

**RECEIVED**

**May 25 2022**

**S.C. SUPREME COURT**

**Via Email Only**

The Honorable Patricia A. Howard  
Supreme Court of South Carolina  
Supreme Court Building  
1231 Gervais Street  
Columbia, South Carolina 29201

Dear Ms. Howard,

RE: Cleo Sanders v. Savannah Highway Automotive  
Appellate Case No. 2021-000137

Pursuant to Rule 208(b)(7), SCACR, Respondent, Cleo Sanders, respectfully brings to the Court's attention the following opinion, filed by the Supreme Court of the United States two days ago, on May 23, 2022:

**Morgan v. Sundance, Inc.**, No. 21-328, 2022 WL 1611788, at \*4 (U.S. May 23, 2022) (holding "the FAA's 'policy favoring arbitration' does not authorize federal courts to invent special, arbitration-preferring procedural rules. . . . If an ordinary procedural rule—whether of waiver or forfeiture or what-have-you—would counsel against enforcement of an arbitration contract, then so be it.")

The case pertains to Issue "3" of the Brief of Respondent.

A copy of the case is attached.

Yours very truly,

LAW OFFICE OF BROOKS R. FUDENBERG, LLC

*s/ Brooks R Fudenberg*  
Brooks R. Fudenberg  
Attorney for Respondent

cc: John T. Lay <jlay@gwblawfirm.com>