

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Jul 28 2022

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In The Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case Number 2020-CP-10-01310

Mohammad Abulaban.....Appellant,

v.

City of Charleston and South Carolina
Department of Transportation..... Defendants,

of whom South Carolina Department
of Transportation is theRespondent.

NOTICE OF APPEAL

Mohammad Abulaban appeals the Orders of the Honorable R. Markley Dennis, Jr., dated May 3, 2022 and June 29, 2022. Appellant received written notice of entry of the judgment of the first Order on May 4, 2022 and of the second Order, which is in part an Order on a Motion to Reconsider, Alter or Amend the first Order, on June 30, 2022.

July 27, 2022

s/J. Matthew Whitehead
J. Matthew Whitehead (S.C. Bar No. 73803)
matt@scclg.com
THE CAROLINA LAW GROUP, LLC
910 E Washington Street
Greenville, SC 29601
Phone: (864) 312-4444
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Attorneys for the Plaintiff/Appellant,
Mohammad Abulaban

Other Counsel of Record:

Phillip S. Ferderigos, Esq.
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ATTORNEYS FOR DEFENDANT
CITY OF CHARLESTON

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ATTORNEYS FOR DEFENDANT/RESPONDENT
SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION

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PROOF OF SERVICE

I certify that on the 27th day of July, 2022, I served a copy of the Notice of Appeal on counsel of record in the above-entitled matter by depositing a copy of same in the United States Mail being sent first-class mail, postage prepaid, addressed to the following:

Phillip S. Ferderigos, Esq.
BARNWELL WHALEY PATTERSON & HELMS, LLC
PO Drawer H
Charleston, SC 29402
ATTORNEYS FOR DEFENDANT
CITY OF CHARLESTON

And

Jonathan J. Anderson, Esq.
ANDERSON REYNOLDS & STEPHENS, LLC
P.O. Box 87
Charleston, SC 29401
ATTORNEYS FOR DEFENDANT/RESPONDENT
SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION

I further certify that on the 27th day of July, 2022, I additionally served a copy of the Notice of Appeal on counsel of record in the above-entitled matter by sending the same to the lawyers' primary e-mail addressed listed in the Attorney Information System (AIS) as follows: *pferderigos@barnwell-whaley.com* and *janderson@arlawsc.com*.

July 27, 2022

s/J. Matthew Whitehead
J. Matthew Whitehead (S.C. Bar No. 73803)
matt@scclg.com
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Attorneys for the Plaintiff/Appellant,
Mohammad Abulaban

Matt Whitehead

From: Matt Whitehead
Sent: Wednesday, July 27, 2022 1:49 PM
To: 'janderson@arlawsc.com'; pferderigos@barnwell-whaley.com
Cc: Nihar Patel; Brandi Presnell; 'fmoore@arlawsc.com'; 'brose@wilsonheyward.com'
Subject: Abulaban v. City of Charleston and SCDOT; CA No.: 2020-CP-10-01310
Attachments: Letter serving Notice of Appeal on City of Charleston.pdf; Letter serving Notice of Appeal on SCDOT.pdf; Notice of Appeal - Abulaban v SCDOT.pdf; Proof of Service of Notice of Appeal - Abulaban v SCDOT.pdf

Please find attached for service upon the City of Charleston and South Carolina Department of Transportation copies of Plaintiff's Notice of Appeal and accompanying Proof of Service of same in the above-referenced action. I have also attached copies of the respective letters with which we are mailing hard copies of the Notice of Appeal and Proof of Service. Please be advised with this Notice of Appeal we intend to appeal Judge Dennis's Order Granting Defendant SCDOT's Motion for Summary Judgment and subsequent Order Denying Plaintiff's Motion to Reconsider, Alter or Amend. We are filing this Notice of Appeal with the South Carolina Court of Appeals and with the Clerk of Charleston County Court of Common Pleas. We will copy you on our request for a copy of the hearing transcript from the hearing on Defendants' motions for summary judgment. Please let us know if you have any questions or any issue opening any of the attachments.

Thanks,
Matt

--

J. Matthew Whitehead
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July 27, 2022

Phillip S. Ferderigos
Barnwell Whaley
211 King Street, Suite 300
Charleston, SC 29401

Re: Mohammad Abulaban vs. City of Charleston and SCDOT
C.A. No.: 2020-CP-10-01310

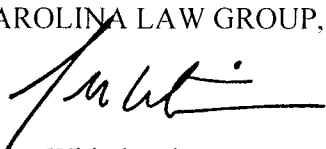
Phillip:

Please find enclosed for service upon you a copy of Plaintiff's Notice of Appeal in the above-reference case, as well as a copy of the Certificate of Service for same. Please be advised we are filing our Notice of Appeal with the South Carolina Court of Appeals and the Clerk of Charleston County Court of Common Pleas.

With kind regards,

Sincerely yours,

THE CAROLINA LAW GROUP, LLC


J. Matthew Whitehead
matt@thecarolinallawgroup.com

JMW/bdp

w/Enclosures

cc: Jonathan J. Anderson, Esquire



* Member Million Dollar Advocate Forum

Monty D. Desai*
Nihar M. Patel*
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July 27, 2022

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ANDERSON REYNOLDS & STEPHENS, LLC
P.O. Box 87
Charleston, SC 29401

**Re: Mohammad Abulaban vs. City of Charleston and SCDOT
C.A. No.: 2020-CP-10-01310**

Phillip:

Please find enclosed for service upon you a copy of Plaintiff's Notice of Appeal in the above-reference case, as well as a copy of the Certificate of Service for same. Please be advised we are filing our Notice of Appeal with the South Carolina Court of Appeals and the Clerk of Charleston County Court of Common Pleas.

With kind regards,

Sincerely yours,

THE CAROLINA LAW GROUP, LLC

J. Matthew Whitehead
matt@thecarolinallawgroup.com

JMW/bdp

w/Enclosures

cc: Phillip S. Ferderigos, Esquire



* Member Million Dollar Advocate Forum