

97334

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

OCT 11 2022

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

G.D. Morgan, Jr., Circuit Court Judge

Case No. 2020-CP-23-01450

Michael Gene Putnam.....Appellant,

v.

Robert Henry Purkerson.....Respondent.

NOTICE OF APPEAL

Michael Gene Putnam, appeals the Order of the G. D. Morgan, Jr., Circuit Court Judge, dated September 8, 2022 denying Plaintiff's Motion to Reconsider the Order Granting Defendants' Motion for Summary Judgment dated August 17, 2022, that are attached hereto.

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr. SC Bar No. 73789
Charles G. Blackburn, SC Bar No. 69458
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
cblackburn@goodwynlaw.com
Attorneys for Appellant

Columbia, South Carolina
October 10, 2022

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

G.D. Morgan, Jr., Circuit Court Judge

Case No. 2020-CP-23-01450

RECEIVED

OCT 11 2022

SC Court of Appeals

Michael Gene Putnam.....Appellant,

v.


Robert Henry Purkerson.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the **Notice of Appeal** on Wesley J. Shull, Esquire, counsel for Respondent at the address below by depositing a copy of same in the United States Mail, postage prepaid, on October 10, 2022.

Wesley J. Shull, Esquire
Willson, Jones, Carter & Baxley
325 Rocky Slope Road, Suite 201
Greenville, SC 29607

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr., SC Bar No. 73789
Charles G. Blackburn, SC Bar No. 69458
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
jgoodwyn@goodwynlaw.com
cblackburn@goodwynlaw.com
Attorneys for Appellant

Columbia, South Carolina
October 10, 2022

T. Jeff Goodwyn, Jr.*†
Charles G. Blackburn**

GOODWYN LAW FIRM, LLC

Tel. (803) 251-4517
Fax (803) 251-4527

2309 Devine Street
Columbia, South Carolina 29205

*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

Email: JGoodwyn@Goodwynlaw.com
CBlackburn@Goodwynlaw.com
Web: www.GoodwynLaw.com

October 10, 2022

RECEIVED

OCT 11 2022

SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: *Michael Gene Putnam v. Robert Henry Purkerson*
Case No.: 2020-CP-23-01450
Our File No.: 3000-0743

Dear Ms. Kitchings:

Enclosed for filing, please find the original and two (2) copies of the Appellant's Notice of Appeal and Proof of Service in regard to the above referenced matter. Please have your office file the original and return the filed, stamped copies to me via my carrier. Also, enclosed is a check in the amount of \$250.00 representing the filing fees for same.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Notice of Appeal.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: The Honorable G. D. Morgan, Jr. (Via Greenville County Clerk of Court)
Wesley J. Shull, Esquire
Michael G. Putnam

Goodwyn Law Firm, LLC
2309 Devine Street
Columbia, S.C. 29205

RECEIVED
OCT 11 2022
SC Court of Appeals

VIA HAND DELIVERY
The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201