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Nov 03 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
FOURTEENTH JUDICIAL CIRCUIT
DONALD B. HOCKER, CIRCUIT COURT JUDGE

CIVIL ACTION NUMBER: 2020-CP-07-1064

Paige N. Lorberbaum,

Appellant,

vs.

Turner's Marina LLC;
Jeffrey A. Klapper;
Diane L. Klapper,

Respondents.

NOTICE OF CROSS-APPEAL

Turner's Marina LLC ("Cross-Appellant/Respondent") hereby respectfully submits its Notice of Cross-Appeal of the Orders of the Honorable Donald B. Hocker, dated August 4, 2022 and September 26, 2022, pursuant to Rule 203, SCACR. Cross-Appellant/Respondent received notice of Appellant Paige N. Lorberbaum's Notice Of Appeal on November 1, 2022. Copies of the Orders being appealed are attached respectively as **Exhibit 1** and **Exhibit 2**.

s/Thomas C. Taylor

Thomas C. Taylor, Esq.

Law Office of Thomas C. Taylor, LLC.

Post Office Box 1808

Bluffton, South Carolina 29910

South Carolina Bar Number: 5499

Telephone: 843-785-5050

Facsimile: 843-738-4502

Email: tom@thomastaylorlaw.com

ATTORNEY FOR CROSS-APPELLANT/RESPONDENT
TURNER'S MARINA LLC

Bluffton, South Carolina

November 3, 2022

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Respondents.

PROOF OF SERVICE

I hereby certify that this law firm represents the Cross-Appellant/Respondent Turner's Marina LLC in the above-captioned matter and that on the date below, in Bluffton, South Carolina, a copy of the foregoing was served on the following persons via electronic mail to their AIS E-mail address:

Documents Served:

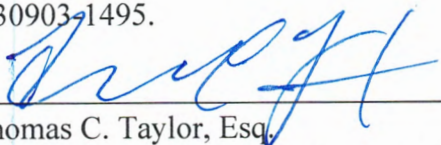
NOTICE OF CROSS-APPEAL

Parties Served:

Russell P. Patterson, Esq.
Russell P. Patterson, P.A.
SC Bar No.: 4375
Post Office Box 8047
Hilton Head Island, SC 29938
russell@russellpattersonlaw.com
ATTORNEY FOR APPELLANT
PAIGE N. LORBERBAUM

James S. Murray, Esq.
Turner Padget Graham & Laney, PA
Post Office Box 1495
Augusta, GA 30903-1495
JMurray@TurnerPadget.com
ATTORNEY FOR RESPONDENTS
JEFFREY A. KLAPPER AND DIANE L. KLAPPER

Additionally, I hereby certify that a copy of same was deposited in the United States Mail on this date, with sufficient First-Class postage pre-paid, addressed to Mr. Patterson at Post Office Box 8047, Hilton Head Island, South Carolina, 29938, and Mr. Murray at Post Office Box 1495, Augusta, GA 30903-1495.



Thomas C. Taylor, Esq.
Law Office of Thomas C. Taylor, LLC.
Post Office Box 1808
Bluffton, South Carolina 29910
South Carolina Bar Number: 5499
Telephone: 843-785-5050
Facsimile: 843-738-4502
Email: tom@thomastaylorlaw.com

ATTORNEY FOR CROSS-APPELLANT/RESPONDENT
TURNER'S MARINA LLC

Bluffton, South Carolina
November 3, 2022

LAW OFFICE OF
THOMAS C. TAYLOR, LLC

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT
COURT MEDIATOR

10 PINCKNEY COLONY ROAD
BUILDING 400
BLUFFTON, SC 29909

TELEPHONE 843-785-5050
TELECOPIER 843-738-4502

www.thomastaylorlaw.com • tom@thomastaylorlaw.com

MAILING ADDRESS
P.O. BOX 1808
BLUFFTON, SC
29910-1808

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SC Court of Appeals

November 3, 2022

Via First Class U.S. Mail and E-Mail Attachment: ctappfilings@sccourts.org

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

Re: Cross-Appeal of Paige N. Lorberbaum v. Turner's Marina LLC, Jeffrey A. Klapper, Diane L. Klapper; Case No. 2020-CP-07-1064

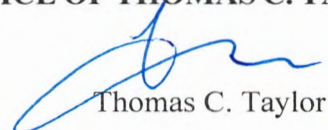
Dear Clerk Kitchens:

I represent the Respondent Turner's Marina LLC in this matter. It is my pleasure to enclose herein pursuant to the South Carolina Appellate Court Rules, the following copy of Turner's Marina LLC's Notice of Cross-Appeal e-filed with the Hon. Jerri Roseneau, Clerk of Court of Beaufort County, on November 3, 2022. The Notice of Cross-Appeal includes copies of all relevant Orders entered in the case, along with a Proof of Service showing attestation of service on November 3, 2022, upon Russell P. Patterson, counsel for the Appellant Paige N. Lorberbaum and James S. Murray, counsel for the Respondents Jeffrey A. Klapper and Diane L. Klapper.

Would you please be so kind as to file and docket the Notice of Cross-Appeal? Thank you.

Please advise me if you have any questions. Thank you again.

Yours very truly,
LAW OFFICE OF THOMAS C. TAYLOR, LLC


Thomas C. Taylor

TCT/dpt

cc: Russell P. Patterson, Esq., and James S. Murray, via US Mail and Email Transmittal
Neil Turner, via e-mail transmittal