

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

RECEIVED

R. Scott Sprouse, Circuit Court Judge
J. Cordell Maddox, Jr., Circuit Court Judge

NOV 29 2022

SC Court of Appeals

Appellate Case Number: 2022-000242

Trial Court Case No. 2019-CP-04-00927

Joyce Porter and Edith Durham.....Respondents,

V.

Jimmy L. Davis, Inc. and Jimmy L. Davis, Individually.....Appellants.

PROOF OF SERVICE

I, the undersigned legal assistant for the attorney for the Appellants, Jimmy L. Davis, Inc., and Jimmy L. Davis, do hereby certify that I have served Appellants' Final Brief and Final Reply Brief and Certificate of Counsel on Joyce Porter and Edith Durham, by depositing a copy of it in the United State Mail, postage prepaid on November 28, 2022, addressed to their attorneys of record, M. Stokely Holder, Esq., and Rayford W. Bussey, Esq., Post Office Box 1804 Greenville, South Carolina 29602, and by electronic mail at: sholder@hplplaw.com and rbussey@hplplaw.com.

November 28, 2022

Tonya M. Gambrell

Tonya M. Gambrell
ALLEN & EAKES
Post Office Box 1405
Anderson, South Carolina 29622
(864)224-1681 / (864) 231-8411 (fax)
Legal Assistant
for Attorney for Appellants

ALLEN AND EAKES LAW

ATTORNEYS AT LAW

P.O. BOX 1405

ANDERSON, S. C. 29622

JAMES S. EAKES*

THOMAS ALLEN (1881-1963)
RICHARD K. ALLEN (1921-1982)
RICHARD K. ALLEN, JR. (1948-2017)

* CERTIFIED CIVIL COURT MEDIATOR

TEL. (864) 224-1681
114 WEST ORR STREET
ZIP 29621
FAX (864) 231-8411

November 28, 2022

Via Email: ctappfilings@sccourts.org

Regular First Class Mail/ Priority Express Mail

RECEIVED

NOV 29 2022

SC Court of Appeals

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

**RE: *Joyce Porter and Edith Dunham v. Jimmy L. Davis, Inc. and
Jimmy L. Davis individually (Case Number 2019-CP-04-00927)
Appellate Case Number: 2022-000 242***

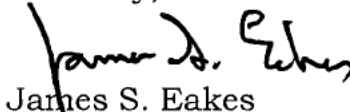
Dear Ms. Kitchings:

Please find enclosed herewith one (1) unbound volume and two (2) bound volumes of the Appellants' Final Brief and Final Reply Brief for filing pursuant to S.C. Supreme Court Order dated August 25, 2021. If you require additional bound volumes, please advise. I have, also, enclosed the originals and two (2) copies of the Certificate of Counsel and Certificate of Service. Please return the "clocked" copies to me in the self-addressed, stamped envelope provided for your convenience.

Respondents' attorneys have been notified of this filing by copy of this transmittal letter, and per the certificate of service.

With best regards, I remain

Sincerely,



James S. Eakes
Post Office Box 1405
Anderson, South Carolina 29622
(864) 224-1681 / (864) 231-8411 (fax)
Attorney for Appellants

JSE/hmg

CC:

M. Stokely Holder, Esquire
Holder, Padgett, Littlejohn & Prickett, LLC

Post Office Box 1804
Greenville, South Carolina 29602

Raford W. Bussey, Jr., Esquire
Holder, Padgett, Littlejohn & Prickett, LLC
Post Office Box 1804
Greenville, South Carolina 29602

PRESS FIRMLY TO SEAL



RDC 07



U.S. POSTAGE PAID
1-114V
ANDERSON, SC
29621
NOV 28 22
ANDERSON
\$28.05
R2304M110883-13

PRIORITY MAIL EXPRESS
RATE REQUIRED

PRIORITY MAIL EXPRESS®

LEGAL FLAT RATE ENVELOPE

ONE RATE ■ ANY WEIGHT

To schedule free Package Pickup, scan the QR code.



USPS.COM/PICKUP



PS10001000059

EP13L May 2020
OD: 15 x 9.5



PEEL FROM THIS CORNER

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE



UNITED STATES POSTAL SERVICE® **PRIORITY MAIL EXPRESS®**

ET 038 344 535 US

RECEIVED
NOV 29 2022

CUSTOMER USE ONLY
FROM: (please print) PHONE: (803) 734-1890

JAMES S. EAKES
Allen and Eakles
P.O. Box 1405
Anderson, SC 29622 SC Court of Appeals

PAYMENT BY ACCOUNT (if applicable)
USPS® Corporate Acct. No. Federal Agency Acct. No. or Postal Service™ Acct. No.

DELIVERY OPTIONS (Customer Use Only)

SIGNATURE REQUIRED: (see instructions) Signature Required No Signature Required

Signature Required: (see instructions) Signature Required No Signature Required

No Signature Required (delivered next business day)

Next Business Day Delivery (additional fee, where available)

"Hold to USPS.com" or local Post Office™ for availability

TO: (please print) PHONE: (803) 734-1890

Jenny Abbott Hitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

29201

For pickup or USPS Tracking™, visit USPS.com or call 800-232-1811.
\$100.00 Insurance Inclusion. Insurance Inclusion.

DELIVERY OPTIONS (Customer Use Only)

PO ZIP Code	Scheduled Delivery Date (see instructions)	Package	Postage
29621	11/29/22	\$ 28.05	
Date Accepted (MM/DD/YYYY)	Scheduled Delivery Time	Insurance Fee	COD Fee
11/28/22	8:00 PM	\$	\$
Time Accepted		Returns Receipt Fee	Live Address Transportation Fee
11:42 AM		\$	\$
Special Handling Fees	Signature Required Fee	Total Package & Fees	
\$	\$	28.05	
Weight	Flat Rate	Acceptance Employee Initials	
1.66 lbs	AA		

DELIVERY OPTIONS (Customer Use Only)

AM PM Employee Signature

AM PM Employee Signature

Labels 11-6, MAY 2021 PMS 7550000-000-000

This envelope is the property of the U.S. Postal Service and is provided solely for use in the Priority Mail Express® shipment. Mailing may be a violation of federal law. This postage is not for return. Error © U.S. Postal Service, May 2020. All rights reserved.