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DEC 19 2022  
SC Court of Appeals

**NOTICE OF APPEAL IN A CIVIL CASE**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
[In the Supreme Court]

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Marvin H. Dukes, III  
Master-In-Equity

**Case No.2015-CP-07-03038**

Atlantic Pools of Hilton Head, Inc., Appellant,  
v.

Plantation Pool Services, LLC  
f/k/a Caribbean Pool Services,  
LLC, and John Philip Schrader Respondent

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Plantation Pool Services, LLC  
f/k/a Caribbean Pool Services,  
LLC, and John Philip Schrader, Third-Party Respondent  
v.

Michael Middleton, Sr. Third-Party Appellant.

**NOTICE OF APPEAL**

The Appellant and Third-Party Appellant appeals the orders [judgments] of the Honorable Marvin H. Dukes, III dated December 9, 2022. Appellants received written notice of the entry of these orders [judgments] on December 9, 2022.

December 13, 2022

FERRENE ASSOCIATES, PA

s/Otto W. Ferrene, Jr.

Otto W. Ferrene, Jr., SC Br No. 1995

19 Shelter Cove Ln, #105

Hilton Head Island, SC 29928-3574

Telephone: (843) 785-5184

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ferrenelaw@reagan.com

Attorney for the Appellant

& Third-Party Appellant

Other Counsel of Record:

James F. Berl, Esquire

70 Main Street, Suite 400

P.O. Box 22626

Hilton Head Island, SC 29925

Attorney for the Respondent

& Third-Party Respondent

**PROOF OF SERVICE OF A NOTICE OF APPEAL**

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v.

Michael Middleton, Sr. Third-Party Appellant.

**PROOF OF SERVICE**

I certify that I have served the Notice of Appeal on the Respondents by personally delivering a copy of it to their attorney of record, James F. Berl, at his office at 70 Main Street, Suite 400, Hilton Head Island, South Carolina 29926, on December 13, 2022.

December 13, 2022

FERRENE ASSOCIATES, PA

s/Otto W. Ferrene, Jr.

Otto W. Ferrene, Jr., SC Br No. 1995

19 Shelter Cove Ln, #105

Hilton Head Island, SC 29928-3574

Telephone: (843) 785-5184

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[ferrenelaw@reagan.com](mailto:ferrenelaw@reagan.com)

Attorney for the Appellant

& Third-Party Appellant

Other Counsel of Record:

James F. Berl, Esquire

70 Main Street, Suite 400

P.O. Box 22626

Hilton Head Island, SC 29925

Attorney for the Respondent

& Third-Party Respondent

**Ferrene & Associates, P.A.**

19 Shelter Cove Lane, Ste. 105  
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December 16, 2022

Honorable Jenny Abbott Kitchings  
Clerk of South Carolina Court of Appeals  
1220 Senate Street  
P.O. Box 11629  
Columbia, SC 29211

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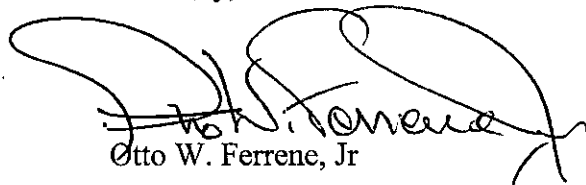
Re: Atlantic Pools of Hilton Head, Inc. vs. Plantation Pool Services, LLC, f/k/a  
Caribbean Pool Services, LLC. , and John Philip Schrader  
Plantation Pool Services, LLC. , f/k/a Caribbean Pool Services, LLC, and John Philip  
Schrader vs. Michael W. Middleton, Sr.  
Case No. 2015-CP-07-03038  
Our File No. 15078

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of Appellant's Notice of Appeal in the Amended Order dated December 9, 2022, Order Denying Plaintiff's Motion for Reconsideration, dated December 9, 2022, and the Proof of Service in the above-referenced matter. Also, enclosed is your filing fee of \$250.00.

By copy of this letter, I am notifying Respondents' Counsel of Record of same. He has previously been served the enclosures.

Sincerely,



Otto W. Ferrene, Jr

OWFJR/trb

cc: James F. Berl, Esquire (U.S. Mail)

Encl



CHARLESTON SC 294  
FRI 16 DEC 2022 PM

Law Offices of Ferrene & Associates, PA  
19 Shelter Cove Lane, Ste. 105  
Hilton Head Island, SC 29928-3574

Honorable Jenny Abbott Kitchings  
Clerk of South Carolina Court of Appeals  
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