

**RECEIVED**  
**Dec 20 2022**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2021-CP-23-4898

Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust..... Plaintiffs,

v.

Maddox Industrial Transformer, LLC and C. Camden Spiller.....Defendants.

and

Maddox Industrial Transformer, LLC..... Counter-Plaintiff,

v.

Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust; and Core Transformers, LLC, f/k/a MBG, LLC.....Counter-Defendants.

Of which Maddox Industrial Transformer, LLC is the Appellant,

and Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust, are the Respondents.

---

**NOTICE OF APPEAL**

---

Maddox Industrial Transformer, LLC (Appellant) appeals the Order Granting in Part Motion for Emergency Mandatory Injunctive Relief of the Honorable Edward W. Miller dated

December 7, 2022 (the Order). Appellant received notice of the entry of the Order on December 7, 2022.

Date: December 20, 2022

By: /s/ Zachary L. Weaver

Zachary L. Weaver (SC Bar #101419)  
Ioannis (Ian) G. Conits (SC Bar #102675)  
Amelia M. Farmer (SC Bar #105570)  
GALLIVAN, WHITE & BOYD, P.A.  
PO Box 10589  
Greenville, SC 29603  
Tel.: (864) 271-9580  
[zweaver@gwblawfirm.com](mailto:zweaver@gwblawfirm.com)  
[iconits@gwblawfirm.com](mailto:iconits@gwblawfirm.com)  
[afarmer@gwblawfirm.com](mailto:afarmer@gwblawfirm.com)

**ATTORNEYS FOR APPELLANT**

Other Counsel of Record:

Clayton M. Custer (SC Bar #68495)  
S. Sterling Laney, III (SC Bar #6933)  
Jason D. Wyman (SC Bar #100271)  
WOMBLE BOND DICKINSON (US) LLP  
P. O. Box 10208  
Greenville, SC 29603-0208  
T: (864) 255-5400  
[clay.custer@wbd-us.com](mailto:clay.custer@wbd-us.com)  
[sterling.laney@wbd-us.com](mailto:sterling.laney@wbd-us.com)  
[jason.wyman@wbd-us.com](mailto:jason.wyman@wbd-us.com)

**ATTORNEYS FOR RESPONDENTS**

**RECEIVED**

**Dec 20 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2021-CP-23-4898

Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust..... Plaintiffs,

v.

Maddox Industrial Transformer, LLC and C. Camden Spiller.....Defendants.

and

Maddox Industrial Transformer, LLC..... Counter-Plaintiff,

v.

Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust; and Core Transformers, LLC, f/k/a MBG, LLC.....Counter-Defendants.

Of which Maddox Industrial Transformer, LLC is the Appellant,

and Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust, are the Respondents.

---

**PROOF OF SERVICE**

---

I do hereby certify that on December 20, 2022, I served the Notice of Appeal on Respondents Randall P. Maddox, Individually as Trustee of the Randall P. Maddox 2007 Trust;

and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust,  
through counsel of record, via electronic mail at the addresses shown below:

[clay.custer@wbd-us.com](mailto:clay.custer@wbd-us.com)  
[sterling.laney@wbd-us.com](mailto:sterling.laney@wbd-us.com)  
[jason.wyman@wbd-us.com](mailto:jason.wyman@wbd-us.com)

DATED: December 20, 2022  
Greenville, South Carolina

*/s/ Ioannis (Ian) G. Conits*  
Ioannis (Ian) G. Conits

## Ian Conits

---

**From:** Ian Conits  
**Sent:** Tuesday, December 20, 2022 4:21 PM  
**To:** sterling.laney@wbd-us.com  
**Cc:** Custer, Clay; Wyman, Jason; Zach Weaver; Amelia Farmer; Lynn Birkner  
**Subject:** Notice of Appeal (C.A. No. 2021-CP-23-4898) [GWB-IMANMAIN.FID875840]  
**Attachments:** Notice of Appeal.pdf

Sterling,

Attached for service is MIT's Notice of Appeal, which we will be filing shortly.

Thank you.

Ian



GALLIVAN WHITE BOYD

*Complex experience for complex matters*

**Ian G. Conits**  
Associate  
iconits@gwblawfirm.com

**Gallivan, White & Boyd P.A.**  
**Office** 55 Beattie Place | Suite 1200 | Greenville SC 29601  
864 271 5432 Direct | 864 271 9580 Main | 864 271 7502 Fax

**Mailing** Post Office Box 10589 | Greenville SC 29603

vCard | BioURL | Website

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

---

Case No. 2021-CP-23-4898

---

Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust..... Plaintiffs,

v.

Maddox Industrial Transformer, LLC and C. Camden Spiller.....Defendants.

and

Maddox Industrial Transformer, LLC..... Counter-Plaintiff,

v.

Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust; and Core Transformers, LLC, f/k/a MBG, LLC.....Counter-Defendants.

Of which Maddox Industrial Transformer, LLC is the Appellant,

and Randall P. Maddox, Individually and as Trustee of the Randall P. Maddox 2007 Trust; and Marvin H. Blundell, Individually and as Trustee of the Marvin H. Blundell Revocable Trust, are the Respondents.

---

**NOTICE OF APPEAL**

---

Maddox Industrial Transformer, LLC (Appellant) appeals the Order Granting in Part Motion for Emergency Mandatory Injunctive Relief of the Honorable Edward W. Miller dated

December 7, 2022 (the Order). Appellant received notice of the entry of the Order on December 7, 2022.

Date: December 20, 2022

By: /s/ Zachary L. Weaver

Zachary L. Weaver (SC Bar #101419)  
Ioannis (Ian) G. Conits (SC Bar #102675)  
Amelia M. Farmer (SC Bar #105570)  
GALLIVAN, WHITE & BOYD, P.A.  
PO Box 10589  
Greenville, SC 29603  
Tel.: (864) 271-9580  
[zweaver@gwblawfirm.com](mailto:zweaver@gwblawfirm.com)  
[iconits@gwblawfirm.com](mailto:iconits@gwblawfirm.com)  
[afarmer@gwblawfirm.com](mailto:afarmer@gwblawfirm.com)

**ATTORNEYS FOR APPELLANT**

Other Counsel of Record:

Clayton M. Custer (SC Bar #68495)  
S. Sterling Laney, III (SC Bar #6933)  
Jason D. Wyman (SC Bar #100271)  
WOMBLE BOND DICKINSON (US) LLP  
P. O. Box 10208  
Greenville, SC 29603-0208  
T: (864) 255-5400  
[clay.custer@wbd-us.com](mailto:clay.custer@wbd-us.com)  
[sterling.laney@wbd-us.com](mailto:sterling.laney@wbd-us.com)  
[jason.wyman@wbd-us.com](mailto:jason.wyman@wbd-us.com)

**ATTORNEYS FOR RESPONDENTS**