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**SC Court of Appeals**

**NOTICE OF APPEAL IN A CIVIL CASE**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2022-CP-26-05002

Derek Calhoun and Jacqueline Calhoun,.....Appellants,

vs.

State of South Carolina, by and through City of North Myrtle Beach,.....Respondent.

**NOTICE OF APPEAL**

Derek Calhoun and Jacqueline Calhoun, by and through their undersigned attorneys, appeal three Form Orders of the Honorable Kristi F. Curtis, the first dated December 12, 2022 denying Appellants' Motion for Change of Venue and Dismissing the Appeal, the second dated December 29, 2022 denying Appellants' Motion for Reconsideration ;and the third dated December 29, 2022 amending scrivener's errors and confirming the denial of Appellants appeal. Copies of the Orders against which this appeal is made are attached hereto as Exhibits A, B, and C respectively, and made part of this Notice by reference.

[Signature Page to Follow]

**Wright, Worley, Pope, Ekster & Moss, PLLC**  
*Attorneys for the Appellant*

*s/Kenneth R. Moss*

January 6, 2023  
North Myrtle Beach, SC

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Kenneth R. Moss, Esquire, SC Bar No. 15520  
Richard L. Snyder, Esquire, SC Bar No. 105192  
628A Sea Mountain Highway  
North Myrtle Beach, SC 29582  
Tel: 843/ 281-9901/ Fax: 843/ 281-9903  
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PROOF OF SERVICE OF NOTICE OF APPEAL

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Derek Calhoun and Jacqueline Calhoun,.....Appellants,

vs.

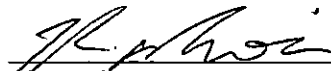
State of South Carolina, by and through City of North Myrtle Beach,.....Respondent.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal upon Francis Humphries, Jr., attorney for Respondent, by emailing same and by depositing a copy by depositing copies of it in the United States Mail, postage prepaid, addressed to Francis A. Humphries, Jr., Esq. City of North Myrtle Beach 1015 2<sup>nd</sup> Avenue South North Myrtle Beach, SC 29582 on January 06, 2023.

January 06, 2023

**WRIGHT, WORLEY, POPE, EKSTER  
& MOSS, PLLC**  
*Attorneys for Appellants*



\_\_\_\_\_  
Kenneth R. Moss  
Richard L. Snyder  
628A Sea Mountain Highway  
North Myrtle Beach, SC 29582  
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RICHARD L. SNYDER \*  
MARTHA HENLEY SLEDGE (Retired)

*D.F. McGOUGAN, JR.*  
*(1921 - 1994)*

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\*\*licensed in NC & SC  
\*licensed in NC, DC & SC  
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\*Of Counsel

January 06, 2023

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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**SC Court of Appeals**

RE: Enclosed Notice of Appeal & filing fee  
Derek Calhoun and Jacqueline Calhoun, Appellants, v. State of South Carolina, by and  
through City of North Myrtle Beach, Respondent, Case No. 2022-CP-26-05002

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above case. Also enclosed are the following:


- (1) Proof of service of the notice of appeal upon the respondents.
- (2) A copy of the orders which are to be challenged on appeal.
- (3) A filing fee of \$250.

January 06, 2023

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Page 2

With best regards, I am

Sincerely,



Kenneth R. Moss

cc: Francis A. Humphries, Jr., Esq.  
City of North Myrtle Beach  
1015 2<sup>nd</sup> Avenue South  
North Myrtle Beach, SC 29582



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