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May 01 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2019-CP-10-00061

DARLEEN RASH, Individually and as
Personal Representative for the ESTATE
OF BRONSON HARLEY RASH,

Appellant,

v.

DOMINION ENERGY (formerly
SOUTH CAROLINA ELECTRIC &
GAS COMPANY); ANTHONY M.
AKBAR; and PAUL QUATTLEBAUM,

Respondents.

NOTICE OF APPEAL

Darleen Rash, Individually and as Personal Representative for the Estate of Bronson Harley Rash, appeals the Orders of the Honorable Deadra L. Jefferson denying Appellant's post-trial motions for Judgment Notwithstanding the Verdict, for a New Trial, and for applying the Thirteenth Juror Doctrine. These include the oral Orders of April 4, 2023, and the written Order of April 13, 2023 (which pertains solely to the motion for Judgment Notwithstanding the Verdict). Appellant received written notice of the latter Order on or about April 13, 2023.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee
Angeline M. Larrivee (S.C. # 105466)
Roy T. Willey, IV (S.C. # 101010)
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Williamston, South Carolina
May 1, 2023

Other Counsel of Record:
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(843) 266-1289 (Ms. Tillman)

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v.

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AKBAR; and PAUL QUATTLEBAUM,

Respondents.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Appellant's Notice of Appeal on Respondents by Electronic Mail and by depositing copies in the U.S. Mail, postage prepaid, on May 1, 2023, addressed to Respondents' attorneys of record:

- Ian S. Ford, Hunter H. James, and Ainsley Fisher Tillman of Ford Wallace Thomson LLC, 715 King Street, Charleston, SC 29403, for Respondent Anthony M. Akbar;
- Jenny Costa Honeycutt of Costa Honeycutt, LLC, P.O. Box 13823, Charleston, SC 29422, for Respondent Paul Quattlebaum;
- Nanette L. Wesley of Wesley Law Firm, LLC, 8990 Main Street, Woodstock, GA 30188, for Respondent Paul Quattlebaum;

- M. Dawes Cooke, Jr. and David Spence Cox of Barnwell Whaley Patterson & Helms, LLC, 211 King Street, Suite 300, P.O. Drawer H, Charleston, SC 29402, for Respondent Dominion Energy;
- Chelsea A. Glover of Johnson, Toal & Battiste PA, 130 Centre Street, Orangeburg, SC 29115, for Respondent Dominion Energy; and
- George Craig Johnson and I.S. Leevy Johnson of Johnson Toal & Battiste, PA, PO Box 1431, Columbia, SC 29202, for Respondent Dominion Energy.

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

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Roy T. Willey, IV (S.C. # 101010)

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Williamston, South Carolina

May 1, 2023

Other Counsel of Record:

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***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2019CP1000061

Official File Stamp: 05-01-2023 09:48:57 AM
Court: CIRCUIT COURT
Common Pleas
Charleston
Case Caption: Darleen Rash , plaintiff, et al VS Daniel Mcjunkin , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
Filed by or on behalf of: Joseph E. Thoensen

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Roy T. Willey, IV for Darleen Rash et al
Joseph E. Thoensen for Darleen Rash et al
Chelsea A. Glover for South Carolina Electric & Gas Company
Tiffany Ann Palmer Elling
J. David Banner
George Craig Johnson for South Carolina Electric & Gas Company
I.S. Leevy Johnson for South Carolina Electric & Gas Company
Carrie A. Fox
David Starr Cobb for Daniel Mcjunkin
Phillip S. Ferderigos
Michael Halbert Dill for Darleen Rash et al
Ainsley Fisher Tillman for Anthony M Akbar
David Spence Cox for South Carolina Electric & Gas Company
M. Dawes Cooke, Jr. for South Carolina Electric & Gas Company
Amanda Kurzen Dudgeon
Kenneth Thomas David for Darleen Rash
Hunter H James for Anthony M Akbar
Ian S. Ford for Anthony M Akbar
Jenny Costa Honeycutt for Paul Quattlebaum

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Nanette L Wesley for Paul Quattlebaum

TOLL FREE: 1(800) 313-2546
FACSIMILE: (843) 494-5536

POULIN | WILLEY ANASTOPOULO

AKIM A. ANASTOPOULO (SC)
ERIC M. POULIN (SC)(GA)(NC)(CA)
ROY T. WILLEY, IV (SC)(KY)(NJ)

REPLY TO ANN STREET OFFICE
TILD@AKIMLAWFIRM.COM

Transportation & Insurance Liability Division

May 1, 2023

VIA U.S. MAIL and E-MAIL ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Darleen Rash, Individually and as Personal Representative for the Estate of Bronson
Harley Rash v. Dominion Energy, et al.*
Case No.: 2019-CP-10-00061

*OF COUNSEL

Dear Ms. Kitchings:

Enclosed for filing with the Court of Appeals is the Notice of Appeal, Proof of Service for the Notice of Appeal, proof of filing with the lower court, and a copy of the order being challenged. A check in the amount of \$250.00 for the filing fee will be sent separately.

If you should have any questions, please do not hesitate to contact our office.

Sincerely,

s/Angeline Larrivee

Cc: Ian S. Ford
Hunter H. James
Ainsley Fisher Tillman
Jenny Costa Honeycutt
Nanette L. Wesley
M. Dawes Cooke, Jr.
David Spence Cox
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MAILING: 32 Ann Street, Charleston, South Carolina 29403

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