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# GOODWYN LAW FIRM, LLC

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September 11, 2023

## VIA HAND DELIVERY

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

RE: *Bertha Goins v. Jenkinsville Water Company, Inc.*  
*Civil Action No.: 2022-CP-20-00104*  
*Appellate Case No.: pending*  
*Our File No.: 3550-0001*


Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of a **Notice of Appeal and Proof of Service** in regards to the above referenced matter. Please have your office file the original and return the filed, stamped copy to me in the self-addressed stamped envelope. Also, enclosed is a check in the amount of \$250.00 representing the filing fee for same.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Notice of Appeal.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures

cc: The Honorable Brian M. Gibbons (Via Fairfield County Clerk of Court)  
Samantha Sanders, Esquire  
Austin T. Reed, Esquire  
Daniel C. Plyler, Esquire  
H. Thomas Morgan, Jr., Esquire

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM FAIRFIELD COUNTY  
CIRCUIT COURT

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Brian M. Gibbons, Circuit Court Judge

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Case No. 2022-CP-20-00104

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Jenkinsville Water Co., Inc.,.....Appellant,

v.

Bertha Goins,.....Respondent.

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**NOTICE OF APPEAL**

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Jenkinsville Water Co., Inc., appeal the order of the Honorable Brian M. Gibbons, Judge  
Fairfield County Circuit Court, dated September 8, 2023 denying Jenkinsville Water Company,  
Inc.’s Motion to alter/amend, as attached hereto.

**GOODWYN LAW FIRM, LLC**



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*Attorney for Appellant*

Columbia, South Carolina  
September 11, 2023



**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

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Fairfield Common Pleas

**Case Caption:** Bertha Goins , plaintiff VS Jenkinsville Water Co., Inc. , defendant, et al  
**Case Number:** 2022CP2000104  
**Type:** Order/Electronic Form 4

So Ordered

s/Brian M. Gibbons #2168 Circuit Judge

Electronically signed on 2023-09-08 11:36:05 page 3 of 3

IN THE STATE OF SOUTH CAROLINA  
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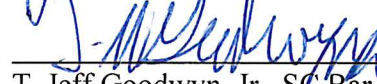
**PROOF OF SERVICE**

I certify that I have served a copy of the **Notice of Appeal** on Samantha Sanders, Esquire; Austin T. Reed, Esquire; Daniel C. Plyler, Esquire and H. Thomas Morgan, Jr., Esquire, Attorneys for Respondent, at the address(es) below by depositing a copy of same in the United States Mail, postage prepaid, on September 11, 2023.

Samantha Sanders, Esquire Smith Robinson Holler Dubose and Morgan, LLC 2530 Devine Street Columbia, SC 29205	Austin T. Reed, Esquire Smith Robinson Holler Dubose and Morgan, LLC 2530 Devine Street Columbia, SC 29205
Daniel C. Plyler, Esquire Smith Robinson Holler Dubose and Morgan, LLC 2530 Devine Street Columbia, SC 29205	H. Thomas Morgan, Jr., Esquire Smith Robinson Holler Dubose and Morgan, LLC 935 Broad Street Camden, S.C. 29020

Columbia, South Carolina  
September 11, 2023

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