

RECEIVED
Sep 13 2023
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable B. Alex Hyman

Case No. 2020-CP-22-00356

Ron Christmas,.....Appellant,

v.

County of Georgetown, City of Georgetown, and South Carolina Department of
Transportation,..... Respondents.

NOTICE OF APPEAL

Ron Christmas (“Appellant”) timely appeals the August 17, 2023, Form 4 Directed Verdict Order of the Honorable B. Alex Hyman in the above matter granting (1) City of Georgetown’s Motion for Directed Verdict as to Plaintiff’s Causes of Action 1-4; (2) County of Georgetown’s Motion for Directed Verdict as to Plaintiff’s Causes of Action 1-4; and (3) South Carolina Department of Transportation’s Motion for Directed Verdict as to Plaintiff’s Causes of Action 1-3. Copies of the Order are attached hereto. Appellant received notice of the Form 4 Directed Verdict Order during the Jury Trial of this matter and by electronic copy on August 17, 2023.

JUSTIN O’TOOLE LUCEY, P.A.

/s/ Joshua F. Evans
Justin O’Toole Lucey (S.C. Bar No. 15438)
Joshua F. Evans (S.C Bar No. 77448)
415 Mill Street
Mount Pleasant, SC 29464
Telephone: (843) 849-8400
Attorneys for Appellant

September 13, 2023
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable B. Alex Hyman

Case No. 2020-CP-22-00356

Ron Christmas,.....Appellant,

v.

County of Georgetown, City of Georgetown, and South Carolina Department of
Transportation,..... Respondents.

PROOF OF SERVICE

I certify that I have served the Appellant’s Notice of Appeal via electronic filing with the
Georgetown County Clerk of Court and on Other Counsel of Record using the primary email
addresses and listed in the Attorney Information System on September 13, 2023:

cc:

Georgetown County Clerk of Court
The Honorable Alma Y. White
P.O. Box 479
Georgetown, SC 29442-0479

Other Counsel of Record:

M. Kirk Battle, Esq.
Michael W. Battle, Esq.
Battle Law Firm, LLC
P.O. Box 530
Conway, SC 29528
kbattle@battlelawsc.com
mbattle@battlelawsc.com

Attorneys for County of Georgetown

Andrew F. Lindemann, Esq.
Lindemann Law Firm, P.A.
P.O. Box 6923
Columbia, SC 29260
Attorneys for City of Georgetown
andrew@ldlawsc.com

Lisa A. Thomas, Esq.
Richardson Plowden
Office: 2103 Farlow Street
Myrtle Beach, SC 29577
Mailing Address: P.O. Box 3646
Myrtle Beach, SC 29578
lthomas@richardsonplowden.com

JUSTIN O'TOOLE LUCEY, P.A.

s/ Joshua F. Evans
Justin O'Toole Lucey (S.C. Bar No. 15438)
Joshua F. Evans (S.C. Bar No. 77448)
415 Mill Street
Mount Pleasant, SC 29464
Telephone: (843) 849-8400
Attorneys for Appellant

September 13, 2023
Charleston, South Carolina