

RECEIVED

Dec 12 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

COURT OF COMMON PLEAS

Daniel John MacDonald Sr., Special Referee Horry County

Case No. 2016-CP-26-06056

RHH Land Investors, LLC.....Respondent

v.

Leonard R. Watts.....Appellant

NOTICE OF APPEAL

Leonard R. Watts, by and through his undersigned counsel, hereby appeals the final decision of the Special Referee for Horry County, Daniel John MacDonald, Sr. dated September 26, 2023 and received September 26, 2023 (attached hereto as Exhibit A) *Order Denying Motion to Set Aside Default Judgment and Motion to Stay Supplemental Proceedings and Enforcement of Judgment* filed September 26, 2023 and the *Order Denying Motion to Reconsider Order Denying Motion to Set Aside Default and Motion to Stay Supplemental Proceedings & Enforcement of Judgment* filed November 14, 2023 (attached hereto as Exhibit B).

Biddle Law Firm, LLC

/s/ James Marshall Biddle

James Marshall Biddle
South Carolina Bar No. 69471
913 Third Avenue
Conway, SC 29526
843-903-1600 Phone
843-903-6209 Fax
marshall@biddlelawfirm.net
Attorney for Appellant
Leonard Ray Watts

Conway, South Carolina
December 12, 2023

Other Counsel of Record:

Aaron J. Angell, Esquire
Angell Molony, LLC
Phone: (864)-248-4708
Fax: (864)-752-1422
18 E. North Street, Suite 302
Greenville, SC 29601
www.angellmolony.com

Kevin N. Molony, Esquire
Kevin D. Beck, Esquire
Jonathan D. Waller, Esquire
Angell Molony, LLC
Ph: 803-335-1449
Fax: 803-335-5422
210 Newberry Street NW
Aiken, SC 29801
www.angellmolony.com

Aaron E. Edwards, Esquire
George Sink, P.A.
7011 Rivers Avenue
North Charleston, SC 29406
Phone: 833-492-0357
Fax: 843-569-1848
www.sinklawn.com

RECEIVED

Dec 12 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

COURT OF COMMON PLEAS

Daniel John MacDonald Sr., Special Referee Horry County

Case No. 2016-CP-26-06056

RHH Land Investors, LLC.....Respondent

v.

Leonard R. Watts.....Appellant

PROOF OF SERVICE

I certify that I have served the Notice of Appeal to the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid on December 12, 2023 and addressed as follows:

Aaron J. Angell, Esquire
Angell Molony, LLC
18 E. North Street, Suite 302
Greenville, SC 29601

Kevin N. Molony, Esquire
Kevin D. Beck, Esquire
Jonathan D. Waller, Esquire
Angell Molony, LLC
210 Newberry Street NW
Aiken, SC 29801

Aaron E. Edwards, Esquire
George Sink, P.A.
7011 Rivers Avenue
North Charleston, SC 29406

Biddle Law Firm, LLC

/s/ James Marshall Biddle

James Marshall Biddle

South Carolina Bar No. 69471

913 Third Avenue

Conway, SC 29526

843-903-1600 Phone

843-903-6209 Fax

marshall@biddlelawfirm.net

Attorney for Appellant Leonard Ray Watts

Conway, South Carolina

December 12, 2023

J. Marshall Biddle
marshall@biddlelawfirm.net

913 THIRD AVENUE
CONWAY, SOUTH CAROLINA 29526
TELEPHONE (843) 903-1600

BIDDLE LAW FIRM, LLC

ATTORNEY AND COUNSELOR AT LAW

www.biddlelawfirm.net

POST OFFICE BOX 1119
CONWAY, SOUTH CAROLINA 29528
FACSIMILE (843) 903-6209

December 12, 2023

VIA EMAIL & US MAIL

The Honorable Jenny Abbott Kitchings
Clerk, The South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

Re: RHH Land Investors, LLC v. Leonard R. Watts, et al.
Horry County Case No. 2016-CP-26-0656

Dear Ms. Kitchings:

Regarding the above-referenced matter, enclosed please find a Notice of Appeal (with exhibits), Proof of Service, and my firm's check in the amount of \$250.00 for the filing fee.

Should you have any questions or need any additional information regarding the enclosed, please do not hesitate to contact me. Thank you for your assistance with this matter.

Yours very truly,
Biddle Law Firm, LLC

James Marshall Biddle

James Marshall Biddle

cc: The Honorable Renee Elvis
Aaron J. Angell, Esquire
Kevin N. Molony, Esquire
Jonathan D. Waller, Esquire
Aaron E. Edwards, Esquire

RECEIVED
Dec 12 2023
SC Court of Appeals