

RECEIVED

Jan 03 2024

SC Court of Appeals

FORM 1
NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA

In The Court of Appeals
[In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

G.D. Morgan Jr. , Circuit Court Judge

Case No. 2023-CP-23-01059

NHE Inc., Respondent.

v.

Jurnie W. & Clifton B., Appellant.

NOTICE OF APPEAL

Jurnie Williams and Clifton Black appeals the order [judgment] of the Honorable G.D Morgan dated November 15, 2023. Appellant received written notice of entry of this order [judgment] on November 21, 2023.

Jurnie Williams & Clifton Black
115 Scottish Ave, Simpsonville SC
Simpsonville, South Carolina 29680
(864) 724-9422
Appellant

Other Counsel of Record:
E. Hood Dawson III
55 Beattie Place
Greenville, South Carolina 29601
(864) 271-5414
Attorney for Defendant

Jurnie Williams
Clifton Black

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Jan 03 2024

SC Court of Appeals

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

G.D. Morgan Jr., Circuit Court Judge

Case No. 2023-CP-23-01059

NHE INC, Respondent,

v.

Jurnie W. & Clifton B., Appellant(s).

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on NHE Inc. by sending a copy via electronic delivery on December 19, 2023, addressed to the email of his attorney of record, E. Hood Dawson III, hdawson@gwblawfirm.com.

December 19, 2023
Jurnie Williams & Clifton Black
Jmd.Williams1@gmail.com
115 Scottish Ave
Simpsonville SC, 29680
(864) 724-9422
Appellant

Jurnie Williams

Clifton Black

FORM 9
LETTER TO CLERK OF LOWER COURT
FILING NOTICE OF APPEAL

RECEIVED

Jan 03 2024

SC Court of Appeals

December 19, 2023

The Honorable _Jenny Abbott Kitchings_
Clerk of Court for Greenville County
P.O. Box 11629
Columbia, SC 29211

RE: Williams v. NHE , Case No. 2023-CP-23-01059

Dear G.D. Morgan Jr., and all those who may be concerned:

Enclosed for filing is a notice of appeal in the above case.

Sincerely,

Jurnie Williams
Clifton Black
Jmd.Williams1@gmail.com
Cblack8340@gmail.com
(864)724-9422
115 Scottish Ave,
Simpsonville SC,29680

Jurnie Williams
Clifton Black

WILLIAMS v. NHE 2023- CP-23-10159 Appeal



me 1:11AM

to Hood ▾



Please see the attachment for our filed appeal.

Speak with you soon & Happy Holidays,
Jurnie Williams
(864)724-9422

SCACRIIFORM01
APPEAL DOC W...



PDF

December 19, 2023

To Whom it may concern,

We are requesting an appeal of the decision made on our case 2023-CP-23-01059. We received the papers on November 21 that our case was dismissed. The case was dismissed due to the claim that we had not taken further action to pursue the case, but we have been in communication with the Defendant's attorney and the Greenville County clerk of courts. We received the evidence request from the defendant, sent a formal response to the Clerk of Court and to the defendant's attorney, while also verifying it was received. We had also reached out to the court a few times about our deposition date in August and September as it was nearing (September 28, 2023), and asked if there was anything needed on our end. We were told no, we have to await the Defendant. We have been trying to set a deposition date with the Defendant and his attorney since then and they have not given us a date, or timeframe, even after we proposed a settlement offer. (Which is no longer on the table.) Before receiving the case dismissal we hadn't heard from them for about a month.

I have attached where we replied, and sent a copy to the Clerk of Court, and where we spoke to the Defendant's attorney to confirm reception.

With our paperwork we have also requested a waiver of the \$250 to appeal our case, since we are able to show we have been in communication and how we have been urging a meeting.

Thank you so much for your time and patience,

Jurnie Williams & Cli on Black

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

Jurnie Williams and Clifton Black,
Plaintiffs,

vs.

NHE, Inc. and Taylor Davis,
Defendant.

IN THE COURT OF COMMON PLEAS
FOR THE THIRTEENTH JUDICIAL
DISTRICT

C.A. No. 2023-CP-23-01059

Notice of Response

23 AUG 7 AM 11:39
Brice Garrett CDC GVL SC

TO: THE LAW FIRM OF GALLIVAN, WHITE, BOYD, P.A

We, Jurnie Williams and Clifton Black, are delivering this notice to confirm we have received and reviewed the defendant's Interrogatories and Productions request, and have also issued our response to the defendants counsel.

electronic delivery addressed as follows:

Hood Dawson
Lisa Underhill
hdawson@gwblawfirm.com
lunderhill@gwblawfirm.com

Signed this 23rd day of July, 2023.

Jurnie Williams & Clifton Black

Jurnie Williams

Clifton Black

ENTERED COMPUTER

Jurnie Williams & Clifton Black

(864)724-9422

Jwd.Williams1@gmail.com

Cblack8340@gmail.com

Sent Via Email, June 14 2023

**Re: Proposed Settlement - Williams & Black v. NHE, Inc. and Davis,
2023-CP-23-01059**

Good Morning,

We are sending this letter in hopes that we may reach an amicable settlement in the case referenced above. Please be advised that although we're hopeful that we can reach a settlement regarding our complaint, this letter does not constitute a binding legal agreement. It should instead be considered the beginning of a conversation that may lead to a legally binding Settlement Agreement, acceptable to all parties.

As a recap of our previous demands we were seeking the amount of two hundred thousand dollars, or a lesser settlement of one hundred fifty thousand dollars (with agreement of additional terms). Our proposed settlement is as follows

- Payment in the amount of \$50,000 (fifty thousand dollars) as full and final satisfaction of all claims and disputes relevant to this case.

This offer is made on the clear understanding that, if accepted, all filed complaints shall be dropped. If you would like to discuss these terms, please reach out to us at any of the contact points listed above. Ideally we would appreciate a response by June 30, 2023 if possible.

Sincerely,

Jurnie Williams & Clifton Black



Jurnie Williams <jmd.williams1@gmail.com>

Williams and Black v. NHE [Response]

2 messages

Jurnie Williams <jmd.williams1@gmail.com>
To: Hood Dawson <hdawson@gwblawfirm.com>
Cc: <cblack8340@gmail.com>, <lunderhill@gwblawfirm.com>

Sun, Jul 23 at 10:32 PM

We have attached a Notice of our response, our response itself, and a Dropbox link to the file requested. Please notify us of any further questions or concerns.

Thank you,

Jurnie W. & Clifton B.

<https://www.dropbox.com/sh/yW6j4ctbd8tfcnk/AAA2Vr4dTPrcpUFZuB4SMp00a?dl=0>

[Quoted text hidden]

Notice of Response_Interrogatories and Production Request.png, I & P Response
Breakdown:2023CP2301069.pdf

Jurnie Williams <jmd.williams1@gmail.com>
To: Hood Dawson <hdawson@gwblawfirm.com>
Cc: <cblack8340@gmail.com>, <lunderhill@gwblawfirm.com>

Mon, Aug 7 at 8:30 PM

Good evening,

We wanted to reach out and see if you all had received our previous email and response, please let us know if you have any questions or concerns!

Thank you for your time and we look forward to hearing from you soon,
[Quoted text hidden]

Jurnie Williams , plaintiff, et al vs. NHE Inc , defendant, et al

Case Number:	2023CP2301059	Court Agency:	Greenville County Common Pleas	Filed Date:	03/02/2023
Case Type:	Common Pleas	Case Sub Type:	Premises Liab 330	File Type:	Non-Jury
Status:	Dismissed	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:	Dismissed by Court - not Rule 40J	Disposition Date:	11/21/2023	Disposition Judge:	Morgan, G. D. Jr.
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties







Judgments

Tax Map Information

Associated Cases

Actions

Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Document
Williams, Jurnie	NEF(11-21-2023 09:11:20 AM) Order/Form 4	Filing		11/21/2023-09:11		
Williams, Jurnie	Order/Form 4- Case Dismissed/Lack of Prosecution	Order		11/21/2023-09:11		
Williams, Jurnie	ADR/Alternative Dispute Resolution (Workflow)	Action		09/28/2023-11:02	11/15/2023-11:02	
Williams, Jurnie	Proof of Service	Filing		08/07/2023-11:38	11/21/2023-11:38	
NHE Inc	Notice/Notice of Appearance	Filing		05/05/2023-08:41	11/21/2023-08:41	
NHE Inc	Answer/Answer	Filing		05/05/2023-08:41	11/21/2023-08:41	
Williams, Jurnie	Service/Affidavit Of Service on Taylor Davis	Filing		05/01/2023-10:57	11/21/2023-10:57	
Williams, Jurnie	Summons & Complaint	Filing		03/02/2023-10:59	11/21/2023-10:59	

To: Hood Dawson <hdawson@gwblawfirm.com>
Cc: cblack8340@gmail.com; Lisa Underhill <lunderhill@gwblawfirm.com>
Subject: Re: Williams and Black v. NHE [Response]

Warning – This email originated outside the GWB email system!

Good evening,

We wanted to reach out and see if you all had received our previous email and response, please let us know if you have any questions or concerns!

Thank you for your time and we look forward to hearing from you soon,

Jurnie W. & Clifton B.

On Sun, Jul 23, 2023 at 10:32 PM Jurnie Williams <jmd.williams1@gmail.com> wrote:

We have attached a Notice of our response, our response itself, and a Dropbox link to the file requested. Please notify us of any further questions or concerns.

Thank you,

Jurnie W. & Clifton B.

<https://www.dropbox.com/5h/wlej4ctbd8tfcnk/AAAZVr4dTPrcpUFZuB45Mp00a?dl=0>

--

Jurnie Williams
(864)724-9422

--

Jurnie Williams
(864)724-9422



Jurnie Williams <jmd.williams1@gmail.com>

RE: Williams and Black v. NHE [Response] [GWB-IMANMAIN.FID1073149]

2 messages

Hood Dawson <hdawson@gwblawfirm.com>

Tue, Aug 8 at 8:58 AM

To: Jurnie Williams <jmd.williams1@gmail.com>

Cc: cblack8340@gmail.com <cblack8340@gmail.com>, Lisa Underhill <lunderhill@gwblawfirm.com>

Yes, I received it. I have not had a chance to look through all of it yet, but will follow up soon.

Thanks,

E. Hood Dawson III

Associate

hdawson@gwblawfirm.com

Gallivan, White & Boyd P.A.

[55 Beattie Place | Suite 1200 | Greenville SC 29601](#)

[864 271 5414 Direct](#) | [864 271 9580 Main](#) | [864 271 7502 Fax](#)

Mailing [Post Office Box 10589 | Greenville SC 29603](#)

[vCard](#) | [BioURL](#) | [Website](#)

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

From: Jurnie Williams <jmd.williams1@gmail.com>

Sent: Monday, August 7, 2023 8:30 PM

To: Hood Dawson <hdawson@gwblawfirm.com>

Thank you for your response, and letting us know!

Talk to you soon,
[Quoted text hidden]