

RECEIVED

Feb 12 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]

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APPEAL FROM GREENVILLE COUNTY

Court of Common Pleas

G.D. Morgan Jr. , Circuit Court Judge

-----  
Case No. 2023-001960  
-----

NHE Inc., Respondent.

v.

Jurnie W. & Clifton B., Appellant.

-----  
NOTICE OF APPEAL  
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Jurnie Williams and Clifton Black appeals the order [judgment] of the Honorable G.D Morgan dated January 30, 2024. Appellant received written notice of entry of this order [judgment] on January 30, 2024. We are requesting the appeal and asking for our case to be reinstated since we can show that we had the previous papers properly serviced.

Jurnie Williams & Clifton Black  
3206 Winterpark Drive, 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

*J. Jurnie Williams*

*J. Clifton Black*

FORM 7  
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals ]

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

G.D. Morgan Jr., Circuit Court Judge

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Case No. 2023-001960

-----  
NHE INC, Respondent,

v.

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

-----  
PROOF OF SERVICE  
-----

I certify that I have served the Notice of Appeal, to reinstate our case on NHE Inc. by having a physical copy serviced by the Greenville County Civil division, E. Hood Dawson III, at his office of Gallivan White Boyd.

February 8, 2024  
Jurnie Williams & Clifton Black  
Jmd.Williams1@gmail.com  
3206 Winterpark Drive,  
Simpsonville SC, 29680  
(864) 724-9422  
Appellant

*J. Jurnie Williams*

*J. Clifton Black*

**RECEIVED**

**Feb 12 2024**

**SC Court of Appeals**

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

February 8, 2024

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

RE: Williams v. NHE , Case No. 2023-001960

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  
3206 Winterpark Drive,  
Simpsonville SC,29680

*J. Jurnie Williams*

*J. Clifton Black*

**RECEIVED**

**Feb 12 2024**

**SC Court of Appeals**

February 8, 2024

To Whom it may  
concern,

We are requesting an appeal of the decision made on our case **Case No. 2023-001960**. We received the papers on January 30 that our case was dismissed Due to failure to provide service papers, but the papers had been sent to the appeals office and weren't processed before the dismissal was issued.

With our paperwork we have also requested a waiver of the \$250 to appeal our case, since we are able to show we had the papers properly serviced and sent them in.

Thank you so much for your time and patience,

Jurnie Williams & Clifton  
Black

*J. Jurnie Williams & Clifton Black*

# Greenville County Sheriff's Office



601 E. McLee Ave., Suite 101  
Greenville, South Carolina 29601  
Phone (864) 282-0008 Fax (864) 235-9171



Party Requesting Service:

MS. JURNIE WILLIAMS  
Attn: Ms. Jurnie Williams  
5 Beachley Pl.  
Simpsonville, SC 29680

## AFFIDAVIT OF SERVICE

*E. Hood Dawson*

Jurnie Williams and Clifton Black, et. al.,  
Plaintiff(s)

vs.  
NHE, Inc. and Taylor Davis, et. al., Defendant(s)

Case No: 2023CP2301059

Name of Deputy: Deborah Hoffman, undersigned, being duly sworn, deposes and says that  
at time of service, s/he was over the age of twenty-one, was not a party to this action;

Date/Time of Service: that on 16-Jan-2024 02:08 pm  
Place of Service: at 55 Beattie Pl, Suite 1200, City of Greenville, State of SC

Documents Served: the undersigned served the documents described as:

Notice of Appeal

Attachment(s)

Notice of Response

Proof of Service

Letters

Service of Process on, A true and correct copy of the aforesaid document(s) was served on:  
Person Served, and E. Hood Dawson

Method of Service: By delivering them into the hands of

Lisa Underhill

Legal Assistant

Signature of Deputy: Subscribed and sworn to before me this

16th day of January, 2024.

Undersigned declares under penalty of perjury that the foregoing is true and correct.



Party Requesting Service:

MS. JURNIE WILLIAMS  
Attn: Ms. Jurnie Williams  
5 Beachley Pl.  
Simpsonville, SC 29680

**AFFIDAVIT OF SERVICE**

*E. Hood Dawson*

Jurnie Williams and Clifton Black, et. al.,  
Plaintiff(s)

VS.

NHE, Inc. and Taylor Davis, et. al., Defendant(s)

Case No: 2023CP2301059

Name of Deputy:

Deborah Hoffman

, undersigned, being duly sworn, deposes and says that  
at time of service, s/he was over the age of twenty-one, was not a party to this action;

Date/Time of Service

that on 16-Jan-2024 02:08 pm

Place of Service:

at 55 Beattie Pl. Suite 1200, City of Greenville, State of SC

Documents Served:

the undersigned served the documents described as:  
Notice of Appeal

Attachment(s)

Notice of Response

Proof of Service

Letters

Service of Process on,  
Person Served, and  
Method of Service:

A true and correct copy of the aforesaid document(s) was served on:  
E. Hood Dawson

By delivering them into the hands of

Lisa Underhill

Legal Assistant

198105-0001  
Zwillenhaus (Ruska)

  
Notary Public for South Carolina  
My Commission Expires: 1-12-33

  
Deborah Hoffman

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

# 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

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 COC 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

ENTERED COMPUTER

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**Jurnie Williams & Clifton Black**

(864)724-9422

[Jwd.Williams1@gmail.com](mailto:Jwd.Williams1@gmail.com)

[Cblack8340@gmail.com](mailto: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>

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## Williams and Black v. NHE [Response]

2 messages

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**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/yWlej4ctbd8tfcnk/AAA2Vr4dTPrcpUFZuB4SMp00a?dl=0>

[Quoted text hidden]

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

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**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

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

## 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!

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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/s/h/wlej4ctbd8tfcnk/AAAZVr4dTPrcpUFZuB45Mp00a?dl=0>

--

Jurnie Williams  
(864)724-9422

--

Jurnie Williams  
(864)724-9422



Jurnie Williams <jmd.williams1@gmail.com>

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

2 messages

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**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](mailto: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.

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**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]