

**RECEIVED**

**Mar 01 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Robert J. Bonds, Circuit Court Judge

---

Case No. 2023-CP-10-01790

---

Jerome B. Crites Jr., Trustee of The BAC Trust U/A Dated April 9, 2021, \_\_\_\_\_ Respondent,

v.

Lawrence E. Miller, \_\_\_\_\_ Appellant.

---

**NOTICE OF APPEAL**

---

Lawrence E. Miller appeals the Orders of the Honorable Robert J. Bonds Granting Respondent's Motion for Judgment on the Pleadings, dated February 2, 2024, and Denying Appellant's Motion to Reconsider, Alter, or Amend, dated February 20, 2024.<sup>1</sup> Appellant received written notice of entry of the above-referenced Orders on February 2, 2024 and February 20, 2024, respectively.

---

<sup>1</sup> Appellant filed his Motion to Reconsider, Alter, or Amend on February 12, 2024 and provided a filed copy of the Motion to the Judge the following day. *See* Rule 59(e), (g), SCRCP.

s/E. Gordon Hay, VI

E. Gordon Hay, VI, Esq. Bar No.: 103641

John H. Guerry, Esq., Bar No.: 101219

Jerry N. Theos, Esq., Bar No.: 5518

Theos Law Firm, LLC

11 State Street

Charleston, South Carolina 29401

(843) 577-7046 P; (843) 203-4985 F

**ATTORNEYS FOR APPELLANT**

March 1, 2024

**Other Counsel of Record:**

Nicholas P. Tierney, Esq. (SC Bar 102381)

Lindsey W. Cooper Jr., Esq. (SC Bar 75712)

M. Lindsay Boyce, Esq. (SC Bar 100532)

Dustin John Pitts, Esq. (SC Bar 102381)

Tyler M. Vaccarella, Esq. (SC Bar 105874)

LAW OFFICES OF L.W. COOPER JR., LLC

36 Broad Street

Charleston, SC 29401

Tel: 843.375.6622

Fax: 843.375.6623

**ATTORNEYS FOR RESPONDENT**

**RECEIVED**

**Mar 01 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Robert J. Bonds, Circuit Court Judge

---

Case No. 2023-CP-10-01790

---

Jerome B. Crites Jr., Trustee of The BAC Trust U/A Dated April 9, 2021, \_\_\_\_\_ Respondent,

v.

Lawrence E. Miller, \_\_\_\_\_ Appellant.

---

**PROOF OF SERVICE**

I certify that I have served the Notice of Appeal by e-filing a copy with the Charleston County Court of Common Pleas, by emailing a copy to Respondent's counsel of record, and by depositing a copy of it in the United States Mail, postage prepaid, on March 1, 2024, addressed to his counsel of record.

Nicholas P. Tierney, Esq. (SC Bar 102381)  
Lindsey W. Cooper Jr., Esq. (SC Bar 75712)  
M. Linsay Boyce, Esq. (SC Bar 100532)  
Tyler M. Vaccarella, Esq. (SC Bar 105874)  
Dustin John Pitts, Esq. (SC Bar 102381)  
LAW OFFICES OF L.W. COOPER JR., LLC  
36 Broad Street  
Charleston, SC 29401

*s/E. Gordon Hay, VI*

E. Gordon Hay, VI, Esq. Bar No.: 103641

John H. Guerry, Esq., Bar No.: 101219

Jerry N. Theos, Esq., Bar No.: 5518

Theos Law Firm, LLC

11 State Street

Charleston, South Carolina 29401

(843) 577-7046 P; (843) 203-4985 F

**ATTORNEYS FOR APPELLANT**

March 1, 2024

## Gordon Hay

---

**From:** Gordon Hay  
**Sent:** Friday, March 1, 2024 12:54 PM  
**To:** 'djp@lwcooper.com'; 'Nick Tierney'; 'lwc@lwcooper.com'; 'Linsay Boyce'; 'tyler@lwcooper.com'  
**Cc:** John Guerry; Janet  
**Subject:** Crites v. Miller, Case No. 2023-CP-10-01790 - Notice of Appeal  
**Attachments:** Crites v. Miller, Letter Encl D's Notice of Appeal (3.1.24).pdf

All,

Please find attached for service a copy of Defendant's Notice of Appeal in the above referenced case. A hard copy has been mailed to your office.

Thank you. Please disregard my prior email.

Sincerely,

**E. Gordon Hay, VI Esquire**



Office: 843.577.7046

Fax: 843.203.4985

Email: [gordon@theoslaw.com](mailto:gordon@theoslaw.com)

11 State Street, Charleston, SC 29401

[TheosLawFirm.com](http://TheosLawFirm.com)

**\*\*CONFIDENTIAL COMMUNICATION\*\*** The information contained in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

**\*\*\*IRS CIRCULAR 230 NOTICE\*\*\*** Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.