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**Apr 08 2024**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
COUNTY OF DORCHESTER

IN THE COURT OF COMMON PLEAS  
FOR THE FIRST JUDICIAL CIRCUIT  
CASE NO.: 2023-CP-18-01621

Eadie’s Construction Company,  
Incorporated and Eadie’s Industrial,  
Incorporated,

Plaintiffs,  
vs.

Eadie’s Diva D Enterprises, LLC,  
Dawn Eadie, Jordan Jones, Justine  
Lawson, Kevin Lawson, Hunter Basco  
and Mackel Maleckar,

Defendants/Third Party Plaintiff’

vs.

Keith Eadie

Third Party Defendant.

**NOTICE OF INTENT TO APPEAL**

Eadie’s Construction, Incorporated, Eadie’s Industrial Incorporated, and Keith Eadie appeal the order of the Honorable Heath Taylor dated March 7, 2024. Appellant received written notice of entry of this order on March 7, 2024.

FERRARA LAW FIRM, PLLC

April 6, 2024

s/ Paul B. Ferrara, III  
Paul B. Ferrara, III (S.C. Bar No. 70511)  
Attorney for Plaintiffs  
8887 Old University Boulevard  
North Charleston, SC 29406  
T: (843) 569-5511 | F: (843) 569-5411  
[paul@ferraralawfirm.net](mailto:paul@ferraralawfirm.net)

Other Counsel of Record:  
Stephen Smith, Esq.  
Emily Hansbarger, Esq.  
7455 Cross County Rd.  
North Charleston, South Carolina 29405  
Attorneys for Defendants

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**PROOF OF SERVICE**

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I certify that I have served a copy of the notice of appeal by emailing a copy to Judge Taylor to [htaylor@sccourts.org](mailto:htaylor@sccourts.org) and Mr. Steven Smith, Esq. at [ssmith@scnlaw.com](mailto:ssmith@scnlaw.com), and Ms. Emily Hansbarger to [ehansbarger@scnlaw.com](mailto:ehansbarger@scnlaw.com) on April 8, 2024.

/s Paul B. Ferrara, III

Paul B. Ferrara, III

SC Bar No. 70511

8887 Old University Blvd. Suite 200

North Charleston, SC 29406

(843) 569-5511/ (843) 569-5411 fax

[paul@ferraralawfirm.net](mailto:paul@ferraralawfirm.net)

Attorney for Plaintiffs

Fw: Received Notice: Your filing, Re: 22-553 - (399) Torts/Other - Appeal/Notice of Appeal to Court of Appeals, was received

PF

Paul Ferrara

To: ehansbarger@scnlaw.com; Steve Smith (Work) <ssmith@scnlaw.com>

Cc: htaylor@sccourts.org



Mon 4/8/2024 6:04 PM



Cover letter - to COA.pdf

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Eadie motion to stay 9-7-2024.pdf

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Notice of Intent to Appeal - Eadie...

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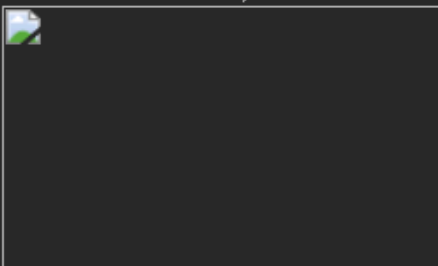


3 attachments (504 KB) [Save all to OneDrive - Ferrara Law Firm, PLLC](#) [Download all](#)

Dear Judge Taylor, Attorney Smith, and Attorney Hansbarger,

Please accept this email as notice of intent to appeal the March 7, 2024 Order in the above matter. I have electronically filed the notice of intent to appeal with the Circuit Court and Court of Appeals.

Sincerely,  
Paul B. Ferrara, III



8887 Old University Blvd., Ste. 201  
N. Charleston, SC 29406  
(843) 569-5511 (office)  
(843) 569-5411 (fax)

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**FERRARA LAW FIRM, PLLC**

8887 Old University Blvd., Ste. 200  
NORTH CHARLESTON, SC 29406  
T: (843) 569-5511 / F: (843) 569-5411

*Paul B. Ferrara, III\**  
*Janel K. Ferrara\**

*\*(also Admitted in N.C.)*

April 8, 2024

**SENT VIA US MAIL AND FACSIMILE TO: 1-803-734-1839**

The Honorable Jenny Abott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE:** Eadie's Construction Company, Inc. v. Eadie's Diva D, et al.  
**Circuit Court No:** 2023-CP-18-01621  
**Our File No.:** 23-553

Dear Ms. Kitchings:

Please find the enclosed Notice of Intent to Appeal, along with proof of service regarding the same. Please file the original and return a clocked copy to our office in the self-addressed, stamped envelope which is enclosed.

Thank you,

**FERRARA LAW FIRM, PLLC**



Paul B. Ferrara, III

Enclosures: as stated