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May 17 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable H. Steven DeBerry, IV
Circuit Court Judge

Case No. 2023-CP-22-00161

Aubrey Dean Hardwick, Appellant,

v.

Robin C. Hardwick f/k/a Robin Beverly, Respondent.

NOTICE OF APPEAL

Aubrey Dean Hardwick, through his undesigned counsel, hereby appeals (1) the *Form 4 Order*, filed March 4, 2024, affirming the Order of the Probate Court, and (2) the corresponding *Order Denying Appellant's Rule 59(e) Motion to Alter or Amend*, filed April 19, 2024, both of which were filed by the Honorable H. Steven DeBerry, IV, as well as the underlying Probate Court *Order Partially Granting and Partially Denying Aubrey Dean Hardwick's Motions for Attorneys Fees and Costs Against the Estate of Mary Helen Hardwick and The Estate of Aubrey Hardwick*, filed on February 16, 2023.

Counsel for Appellant received written notice of entry of the *Form 4 Order* on March 4, 2024 and timely filed his *Rule 59(e) Motion to Alter or Amend* on March 14, 2024. Counsel for Appellant received written notice of entry of the *Order Denying Appellant's Rule 59(e) Motion to Alter or*

Amend on April 19, 2024. Copies of the subject orders under appeal are attached to the Notice of Appeal.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)
751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
jesse@jessesanchezlaw.com
(843) 814-8181

Attorney for Appellant Aubrey Dean Hardwick

Mount Pleasant, South Carolina
May 17, 2024

Other Parties and Counsel of Record:

Randall K. Mullins, Esquire
Jarrod E. Ownbey, Esquire
Mullins Law Firm
Post Office Box 585
North Myrtle Beach, SC 29597
mullinslawfirm@aol.com
(843) 272-8902

Attorneys for Respondent Robin C. Hardwick

Clifford H. Tall, Esquire
4702 Oleander Drive, Suite 100
Myrtle Beach, SC 29577
ctallpa@sc.rr.com
(843) 497-9777

Personal Representative of the Estate of Mary Helen Hardwick and the Estate of Aubrey Hardwick

Kristy Johnson
2705 Truluck Johnson Road
Aynor, SC 29511
(843) 283-0483
kristy@seedslingers.com

Personal Representative for the Estate of Pansy Goodson

Ricky Ludlam
5301 Miracle Lane
Conway, SC 29527
843-246-8126
r.ludlam1963@gmail.com
Personal Representative for the Estate of Tammy Ludlam

Julius Harold Goodson, Jr.
3060 Hwy 501 E
Aynor, SC 29511
Pro Se

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Case No. 2023-CP-22-00161

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v.

Robin C. Hardwick f/k/a Robin Beverly, Respondent.

PROOF OF SERVICE

I, the undersigned, certify that I have served Appellant Aubrey Dean Hardwick's *Notice of Appeal* on all counsel of record via their AIS-designated email addresses (and by Electronic Filing), and by U.S. Mail on all non-attorney Personal Representatives and *Pro Se* parties to the underlying action at the addresses listed below on this 17th day of May 2024.

Pursuant to Rule 262(C)(3), SCACR, and the Order of The Supreme Court of South Carolina, RE: Methods of Electronic Filing Under Rule 262 of the South Carolina Appellate Court Rules (as Amended April 24, 2024), a copy of the email to counsel is attached. Additionally, a Notice of Electronic Filing (NEF) demonstrating that the Notice of Appeal was filed with the Circuit Court is attached in accordance to said Order.

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Attorneys for Respondent Robin C. Hardwick

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Personal Representative for the Estate of Tammy Ludlam

Julius Harold Goodson, Jr. 3060 Hwy 501 E
Aynor, SC 29511
Pro Se

[Signature on following page]

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

751 Johnnie Dodds Blvd., Suite 200

Mount Pleasant, SC 29464

jesse@jessesanchezlaw.com

(843) 814-8181

Attorney for Appellant Aubrey Dean Hardwick

Mount Pleasant, South Carolina

May 17, 2024



May 17, 2024

VIA ONEDRIVE ELECTRONIC SUBMISSION AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RECEIVED
May 17 2024
SC Court of Appeals

RE: NOTICE OF APPEAL
Aubrey Dean Hardwick, Appellant v. Robin C. Hardwick f/k/a Robin
Beverly, Respondent - Circuit Court Case No. 2023-CP-22-00161

Dear Ms. Kitchings:

Enclosed for filing, please find the following:

1. Appellant Aubrey Dean Hardwick's Notice of Appeal with copies of the corresponding orders under appeal;
2. Proof of Service, evidencing service on all parties of record, with Notice of Electronic Filing (NEF) demonstrating the Notice of Appeal was also filed with the Circuit Court.

A check for the two hundred fifty-dollar (\$250.00) filing fee has been deposited in today's outgoing mail. Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez
Jesse Sanchez (SC Bar No. 101906)

Enclosures (as stated)

Cc: Randall K. Mullins, Esquire (Via AIS Email)
Jarrod E. Ownbey, Esquire (Via AIS Email)
Clifford H. Tall, Esquire (Via AIS Email)
Kristy Johnson (Via U.S. Certified Mail)
Ricky Ludlam (Via U.S. Certified Mail)
Julius Harold Goodson, Jr. (Via U.S. Certified Mail)

From: DoNotReply@ereceipt.usps.gov
Subject: USPS eReceipt
Date: May 17, 2024 at 3:17 PM
To: JESSE@jessesanchezlaw.com JESSE@JESSESANCHEZLAW.COM



OAKBROOK
10070 DORCHESTER RD
SUMMERVILLE, SC 29485-9998
(800)275-8777

05/17/2024

03:17 PM

| Product | Qty | Unit Price | Price |
|---|-----|------------|------------------|
| PurpleHeartMedal | 1 | \$0.68 | \$0.68 |
| First-Class Mail® Large Envelope Conway, SC 29527 Weight: 0 lb 6.50 oz Estimated Delivery Date Mon 05/20/2024 | 1 | | \$2.83 |
| First-Class Mail® Large Envelope Aynor, SC 29511 Weight: 0 lb 6.50 oz Estimated Delivery Date Mon 05/20/2024 Certified Mail® Tracking #: 9589 0710 5270 1890 5372 84 | 1 | | \$2.83 \$4.40 |
| Total | | | \$7.23 |
| First-Class Mail® Large Envelope Aynor, SC 29511 Weight: 0 lb 6.70 oz Estimated Delivery Date Mon 05/20/2024 Certified Mail® Tracking #: 9589 0710 5270 1890 5372 53 | 1 | | \$2.83 \$4.40 |
| Total | | | \$7.23 |
| First-Class Mail® Large Envelope Conway, SC 29527 Weight: 0 lb 12.00 oz Estimated Delivery Date Mon 05/20/2024 Certified Mail® Tracking #: 9589 0710 5270 1890 5372 77 | 1 | | \$4.03 \$4.40 |
| Total | | | \$8.43 |

Grand Total: \$26.40

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Card Name: VISA
Account #: XXXXXXXXXXXX0500
Approval #: 055786
Transaction #: 687
Receipt #: 096842
Debit Card Purchase: \$26.40 Chip
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From: Jesse Sanchez jesse@jessesanchezlaw.com 
Subject: Notice of Appeal - Aubrey Dean Hardwick, Appellant v. Robin C. Hardwick, Respondent, Case No. 2023-CP-22-00161
Date: May 17, 2024 at 1:50 PM
To: mullinslawfirm@aol.com, ctallpa@sc.rr.com
Cc: Deirdre Edmonds dedmonds@dedmondslaw.com

Counsel,

For service, please find the attached Notice of Appeal and corresponding Cover Letter, which are being filed momentarily with the South Carolina Court of Appeals via OneDrive Electronic Submission.

Regards,

Jesse

--

PLEASE NOTE WE HAVE A NEW ADDRESS:

Jesse Sanchez
The Law Office of Jesse Sanchez, LLC
751 Johnnie Dodds Blvd., Suite 200
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Direct: (843) 814-8181
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**Hardwick - Letter to Kitchings
20240517.pdf**



**Hardwick - Notice of Appeal w
Orders.pdf**
2.6 MB



From: efiledonotreply@sccourts.org
Subject: Courtesy NEF RE: 2023CP2200161
Date: May 17, 2024 at 1:32 PM
To: jesse@jessesanchezlaw.com
Cc: jesse.sanchez@mac.com



******* IMPORTANT NOTICE - READ THIS INFORMATION *******
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2023CP2200161

Official File Stamp: 05-17-2024 01:31:36 PM
Court: CIRCUIT COURT
Common Pleas
Georgetown
Case Caption: Aubrey Dean Hardwick , plaintiff, et al VS Robin Beverly , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
Filed by or on behalf of: Jesse Sanchez

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Jarrold Elliott Ownbey for Robin Hardwick
Randall K. Mullins for Robin Hardwick
Deirdre W. Edmonds for Aubrey Dean Hardwick
Jesse Sanchez for Aubrey Dean Hardwick

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Dean Hardwick Prs
Aubrey Dean Hardwick Prs
Mary Helen Hardwick Est
Dean Hardwick
Mary Helen Hardwick
Pansy Goodson
Tammy Ludlam
Julius Harold Goodson, Jr
Aubrey Hardwick
Tammy Ludlum
Robin Beverly

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