

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

JUN 05 2024

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
CIRCUIT COURT

G.D. Morgan, Jr., Circuit Court Judge

Perry H. Gravely, Circuit Court Judge

Case No. 2020-CP-23-01450  
Appellant Case No.: 2022-001432

Michael Gene Putnam.....Appellant,

vs.

Robert Henry Purkerson.....Respondent.

**PROOF OF SERVICE**

I certify that I have served a copy of the **FINAL BRIEF OF APPELLANT** on counsel for Respondent at the address below Via U.S. Regular Mail, postage prepaid, on June 5, 2024.

Langdon Cheves, Esquire  
Laura C. Tesh, Esquire  
Wilson, Jones, Carter & Baxley  
325 Rocky Slope Road, Suite 201  
Greenville, SC 29607

\*\*\*SIGNATURE TO FOLLOW ON NEXT PAGE\*\*\*

**GOODWYN LAW FIRM, LLC**

/s/ T. JEFF GOODWYN, JR.

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*Attorney for Appellant*

Columbia, South Carolina

June 5, 2024

T. Jeff Goodwyn, Jr.\*†  
Charles G. Blackburn\*\*  
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\*Also Licensed in Georgia  
† Certified Circuit Court Mediator  
\*\* Of Counsel

June 5, 2024

**VIA HAND-DELIVERY**

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

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RE: *Michael Gene Putnam v. Robert Henry Purkerson*  
*Appellate Case No.: 2022-001432*  
*Our File No.: 3000-0743*

Dear Ms. Kitchings:

Enclosed for filing, please find the **Final Brief of Appellant**, along with a Proof of Service in regards to the above referenced matter. Please return a filed copy of the Proof of Service in the self-addressed stamped envelope.

As evidenced in the Proof of Service, I have served all interested parties with a copy.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Langdon Cheves, III, Esquire  
Laura C. Tesh, Esquire