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Jul 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Grenville D. Morgan, Jr., Circuit Court Judge

Case No. 2021-CP-26-02184

Joseph Parks Brown, Respondent,

v.

Carlton E. Thompkins, Timothy W. Thompkins,
Thompkins Investments, LLC, and Thompkins Storage, LLC, Defendants,

of whom
Carlton E. Thompkins, Thompkins Investments, LLC,
and Thompkins Storage, LLC, are Appellants.

NOTICE OF APPEAL

Carlton E. Thompkins, Thompkins Investments, LLC, and Thompkins Storage, LLC appeal the judgment entered on March 21, 2024, the order of the Honorable Grenville D. Morgan dated June 6, 2024, denying post-verdict motions, and the order dated June 7, 2024 awarding relief pursuant to Rule 54, SCRPC. Appellants received written notice of the entry of the orders on the respective dates of the orders.

July 8, 2024

s/ John S. Nichols
SC Bar No. 4210
Bluestein Thompson Sullivan, LLC
Post Office Box 7965
Columbia, South Carolina 29201
(803) 7798-7599
john@bluesteinattorneys.com

Edward B. Davis Inabnit, Jr.
SC Bar No. 73700
Inabnit & Dingle, PA

1004 Buck Street
Conway, South Carolina 29526
(843) 248-2089
davis@inabnitlaw.com

Attorneys for Appellants

Other counsel of Record:

Kenneth Ray Moss, Esquire
SC Bar No. 15520
Wright, Worley, Pope, Ekster & Moss, PLLC
628A Sea Mountain Highway
North Myrtle Beach, South Carolina 29582
(843) 281-9901
kennethmoss@wvpeplaw.com

Attorney for Respondent

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Carlton E. Thompkins, Thompkins Investments, LLC,
and Thompkins Storage, LLC, are Appellants.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Joseph Parks Brown by electronic mail pursuant to *Re: Methods of Electronic Filing*, Order (S.C. Sup. Ct. filed April 24, 2024) (Howard Adv. Sh. No 15 at 1)(Appellate Case No. 2020-000447), Paragraph (d), by sending these documents by portable document format (pdf) to the following electronic mail address listed in the Attorney Information System as required by Rule 410, SCACR:

Kenneth Ray Moss, Esquire
kennethmoss@wvpemlaw.com
Attorney for Respondent

July 8, 2024

S/ Meredith Brown
Meredith Brown
Bluestein Thompson Sullivan, LLC
meredith@bluesteinattorneys.com

Meredith Brown

From: Meredith Brown
Sent: Monday, July 8, 2024 1:04 PM
To: kennethmoss@wwpemlaw.com
Subject: Case No.: 2021-CP-26-02184- Joseph Parks Brown v Carlton E Thompkins, Thompkins Investments, LLC, and Thompkins Storage, LLC
Attachments: Notice of Appeal.pdf

Dear Mr. Moss:

Attached please find the Notice of Appeal which is being served upon you in the above matter.

Thank you,
Meredith Brown



MEREDITH BROWN OFFICE MANAGER

1614 TAYLOR STREET | PO BOX 7965

COLUMBIA, SOUTH CAROLINA 29202

O: 803.779.7599 F: 803 771.8097

MEREDITH@BLUESTEINATTORNEYS.COM

BLUESTEINATTORNEYS.COM



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BLUESTEIN THOMPSON SULLIVAN, LLC
BLUESTEINATTORNEYS.COM

July 8, 2024

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Joseph Parks Brown, Respondent, v. Carlton E. Thompkins, Timothy W. Thompkins, Thompkins Investments, LLC, and Thompkins Storage, LLC., Defendants, of whom Carlton E. Thompkins, Thompkins Investments, LLC, and Thompkins Storage, LLC, are Appellants.
Case No. 2021-CP-26-02184

Dear Ms. Kitchings:

Appellants Carlton E. Thompkins, Thompkins Investments, LLC and Thompkins Storage, LLC, have engaged me to assist with the appeal in this matter. Please note my appearance. Also, please find enclosed for filing a notice of appeal in this case along with (1) Proof of service of the notice of appeal on the Respondent and (2) a copy of the orders which are to be challenged on appeal. Pursuant to Paragraph (c) of *Re: Methods of Electronic Filing*, Order (S.C. Sup. Ct. filed April 24, 2024) (Howard Adv. Sh. No 15 at 1)(Appellate Case No. 2020-000447), we shall deliver the filing fee of \$250.00 to the Court within five (5) days of this filing.

Sincerely,

s/ John S. Nichols
Bluestein Thompson Sullivan, LLC
Post Office Box 7965
Columbia, South Carolina 29201
(803) 7798-7599
john@bluesteinattorneys.com
Attorney for Appellants

cc: The Honorable Renee N. Elvis
Clerk of Court for Horry County

Kenneth Ray Moss, Esquire
Wright, Worley, Pope, Ekster & Moss, PLLC
628A Sea Mountain Highway
North Myrtle Beach, South Carolina 29582
(843) 281-9901

kennethmoss@wwpemlaw.com
Attorney for Respondent
