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Sep 20 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
In the Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge
J. Derham Cole, Circuit Court Judge

Case No. 2023-CP-30-00168

Susan MedlinRespondent,

v.

Legacy Housing Corporation.....Appellant.

NOTICE OF APPEAL

Legacy Housing Corporation appeals the following:

- (1) the Honorable Frank R. Addy, Jr.’s Form 4 Judgment in a Civil Case Denying Legacy Housing Corporation’s Motion for Relief from Entry of Default dated August 7, 2023, and received by Appellant August 7, 2023 (attached as Exhibit 1);
- (2) the Honorable Frank R. Addy, Jr.’s Form 4 Judgment in a Civil Case Denying Legacy Housing Corporation’s Motion to Reconsider dated August 31, 2023, and received by Appellant August 31, 2023 (attached as Exhibit 2);
- (3) the Honorable J. Derham Cole’s Form 4 Judgment in a Civil Case and Order dated July 25, 2024, and received by Appellant July 27, 2024 (attached as Exhibit 3); and
- (4) the Honorable J. Derham Cole’s Form 4 Judgment in a Civil Case Denying Legacy Housing Corporation’s Motion to Reconsider dated August 23, 2024, and received by Appellant August 23, 2024 (attached as Exhibit 4).

Signature Page Follows

Respectfully submitted,

BURR & FORMAN LLP

s/ Tracey C. Green

Tracey C. Green (S.C. Bar No. 9342)
1221 Main Street, Suite 1800
PO Box 11390 (29211)
Columbia, SC 29201
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*Attorneys for Appellant Legacy Housing
Corporation*

September 20, 2024
Columbia, South Carolina

Other Counsel of Record:

Rodney M. Brown
Rodney M. Brown, P.A.
210 S. Main Street
Fountain Inn, SC 29644
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Attorney for Respondent Susan Medlin

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PROOF OF SERVICE

This is to certify that I, Laura Lee Andrews, a paralegal with the law firm of Burr & Forman LLP, have caused to be served this day one (1) copy of the **Notice of Appeal** in the above-captioned matter upon counsel for Respondent Susan Medlin via email at the email address reflected in the Attorney Information System and as set forth below:

Rodney M. Brown
Rodney M. Brown, P.A.
210 S. Main Street
Fountain Inn, SC 29644
rod@rodneybrownlaw.com

A copy of the email serving counsel as stated above is attached hereto.



Laura Lee Andrews
Paralegal

September 20, 2024
Columbia, South Carolina

Laura Lee Andrews

From: Laura Lee Andrews
Sent: Friday, September 20, 2024 1:33 PM
To: Rod Brown
Cc: Tracey Green (tgreen@burr.com); Randy Lowell (rlowell@burr.com)
Subject: Medlin v. Legacy Housing Corporation | C/A No. 2023-CP-30-00168
Attachments: 2024-09-20 Filing ltr re NOA.pdf; 2024-09-20 POS re Legacy Notice of Appeal.pdf; 2024-09-20 Legacy Notice of Appeal.pdf; 2024-09-20 Legacy Notice of Appeal_Ex 2 (8.31.23 Order).pdf; 2024-09-20 Legacy Notice of Appeal_Ex 3 (7.27.23 Order).pdf; 2024-09-20 Legacy Notice of Appeal_Ex 4 (8.23.24 Order).pdf; 2024-09-20 Legacy Notice of Appeal_Ex 1 (8.7.23 Order).pdf

Mr. Brown,

Attached for service in the above matter is Legacy Housing Corporation's Notice of Appeal. We will be filing this notice shortly with the Court of Appeals and will attach this email to the proof of service of same.



Tracey C. Green
tgreen@burr.com
Direct Dial: (803) 753-3224

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SC Court of Appeals

1221 Main Street
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Columbia, SC 29201

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BURR.COM

September 20, 2024

VIA ELECTRONIC FILING

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

Re: *Susan Medlin v. Legacy Housing Corporation*; C/A No. 2023-CP-30-00168

Dear Ms. Kitchings:


Pursuant to Rules 203 and 262(a)(3) of the South Carolina Appellate Court Rules and Supreme Court Order 2024-04-24-01 part (b)(2), attached for filing is Legacy Housing Corporation's Notice of Appeal in the above matter. By copy of this letter, I am serving counsel for Respondent via email as permitted by Rule 262(c)(3), SCACR and Order 2024-04-24-01 part (d)(1) and attached is a proof of service to that effect.

A check in the amount of \$250 for the required filing fee is being forwarded to your attention via U.S. Mail.

Thank you. Please contact me if you have any questions.

Sincerely,

Burr & Forman LLP



Tracey C. Green

TCG/lla
Attachments

cc: Rodney M. Brown (via email)

AL • DE • FL • GA • MS • NC • SC • TN