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**Oct 15 2024**

**SC Court of Appeals**

**MARY HARRIET MOORE**  
mhmoore@rosenhagood.com

October 15, 2024

**VIA EMAIL FOR ELECTRONIC FILING:**

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

Re: Aszane Cruz v. Arete Wyndham Property Owner, LLC d/b/a Wyndham Place Apartments; Casa Bahari, LLC; Darlington 48 Unit, LLC; and John Doe, individually and as manager/general manager of Arete Wyndham Property Owner, LLC d/b/a Wyndham Place Apartments  
Court of Common Pleas Case No. 2023-CP-21-02320

Dear Ms. Kitchings:

We are in receipt of the Court of Appeals' October 15, 2024, deficiency letter. Enclosed please find a copy of the filed Notice of Appeal with the Florence County Clerk of Court. Of course, please do not hesitate to contact us if you have any questions about the above.

With best regards, I am

Sincerely,

s/ Mary Harriet Moore

Mary Harriet Moore

MHM/  
Encl.

cc: The Honorable Jenny Abbott Kitchings (w/ encl.)  
Lane Jefferies, Esquire (w/ encl.)  
India Shaw, Esquire (w/ encl.)  
Chip Bruorton, Esquire (w/ encl.)

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**Oct 11 2024**

**SC Court of Appeals**

ELECTRONICALLY FILED - 2024 Oct 15 1:39 PM - FLORENCE - COMMON PLEAS - CASE#2023CP2102320

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas  
Michael G. Nettles, Circuit Judge

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Court of Common Pleas Case No. 2023-CP-21-02320

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ASZANE CRUZ,

PLAINTIFF/RESPONDENT,

v.

ARETE WYNDHAM PROPERTY OWNER, LLC  
D/B/A WYNDHAM PLACE APARTMENTS; CASA  
BAHARI, LLC; DARLINGTON 48 UNIT, LLC; AND  
JOHN DOE, INDIVIDUALLY AND AS MANAGER/  
GENERAL MANAGER OF ARETE WYNDHAM  
PROPERTY OWNER, LLC D/B/A WYNDHAM PLACE  
APARTMENTS,

DEFENDANTS

OF WHOM CASA BAHARI, LLC IS,

APPELLANT.

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**NOTICE OF APPEAL**

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Pursuant to South Carolina Appellate Court Rule 203(b)(1), Defendant/Appellant Casa Bahari, LLC (“Appellant”), by and through its undersigned attorneys, hereby appeals the following orders of the Honorable Michael G. Nettles, Circuit Court Judge:

- Order Granting Default Judgment, filed April 2, 2024; and
- Order Denying Defendant Casa Bahara, LLC’s Motion to Reconsider, filed September 11, 2024.

Counsel for Appellant received written notice of the entry of the Circuit Court’s Order Denying Defendant Casa Bahari, LLC’s Motion to Reconsider on September 11, 2024, thus this

Notice of Appeal is timely filed pursuant to South Carolina Appellate Court Rule 203(b)(1). Copies of the Circuit Court's Orders being appealed from are attached hereto.

ROSEN HAGOOD, LLC

By: *s/Mary Harriet Moore*  
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Mary Harriet Moore, Esquire (SC Bar 105312)  
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ATTORNEYS FOR APPELLANT

Charleston, South Carolina  
October 11, 2024.

Other attorneys of record:

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ATTORNEYS FOR DEFENDANTS  
CASA BAHARI, LLC AND ARETE  
WYNDHAM PROPERTY OWNER, LLC

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PROPERTY OWNER, LLC D/B/A WYNDHAM PLACE  
APARTMENTS,

DEFENDANTS

OF WHOM CASA BAHARI, LLC IS,

APPELLANT.

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**PROOF OF SERVICE**

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I, the undersigned of the law office of Rosen Hagood, LLC, attorneys for Appellant Casa Bahari, LLC, do hereby certify that I have caused to be served all parties and/or their attorneys of record to this appeal by copy of the Notice of Appeal, which copy has been emailed and/or mailed, with sufficient postage affixed thereto, to the addresses below:

Parties Served:

India Shaw, Esquire ([india.shaw@poulinwilley.com](mailto:india.shaw@poulinwilley.com) / [teamshaw@poulinwilley.com](mailto:teamshaw@poulinwilley.com))  
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