

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM AIKEN COUNTY  
Eugene C. Griffith, Jr., Circuit Court Judge

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Appellate Case No. 2024-000592  
Case No. 2020-CP-02-2238

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Cassiopia Rhoads, ..... Appellant-Respondent,

v.

Aiken County Sheriff's Office, ..... Respondent-Appellant.

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**NOTICE OF CONDITIONAL CROSS-APPEAL**

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In his Order Granting Defendant's Motion to Alter or Amend Order and JNOV Motion filed August 19, 2024, Circuit Judge Eugene C. Griffith, Jr. granted the Motion to Alter or Amend Order and/or Motion to Reconsider filed by the Respondent-Appellant Aiken County Sheriff's Office (ACSO), and with that decision granted the Aiken County Sheriff's Office's JNOV Motion on the basis of its defense pursuant to S.C. Code Ann. § 15-78-70(d). Judge Griffith further

vacated his previous post-trial orders, including the Order Relating to Post-Trial Motions filed March 12, 2024, and Order Reducing Verdict to Statutory Cap filed March 12, 2024.

On September 17, 2024, the Appellant-Respondent Cassiopia Rhoads filed a Notice of Appeal appealing the Order Granting Defendant's Motion to Alter or Amend Order and JNOV Motion filed August 19, 2024.

In the event that Rhoads seeks as relief in her appeal that this Court reverse the Order Granting Defendant's Motion to Alter or Amend Order and JNOV Motion and reinstate the previous post-trial orders which were vacated as well as the judgment previously entered on March 12, 2024, the Respondent-Appellant Aiken County Sheriff's Office hereby conditionally appeals the judgment entered on March 12, 2024, and the Order Relating to Post-Trial Motions filed on March 12, 2024, if reinstated.

The Appellant-Respondent Cassiopia Rhoads had also filed a Motion for Reconsideration on August 29, 2024. Circuit Judge Eugene C. Griffith, Jr. issued an Order denying that motion on September 19, 2024. Counsel for the Respondent-Appellant Aiken County Sheriff's Office received written notice of entry of the Order filed September 19, 2024, on that same date.

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October 21, 2024

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*Counsel for Appellant-Respondent  
Cassiopia Rhoads*

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**CERTIFICATE OF SERVICE**

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Pursuant to Section (d)(1) of the Supreme Court's Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Appellant, does hereby certify that service of the **Notice of Conditional Cross-Appeal** in the above-captioned matter was made upon all counsel of record by email only this the 21st day of October 2024 as follows:

Francis M. Hinson, IV, Esquire  
HHP Law Group, LLC  
Email: [brink@hhplawgroup.com](mailto:brink@hhplawgroup.com)

Patrick J. McLaughlin, Esquire  
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*s/ Andrew F. Lindemann*

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*\*Also Admitted in North Carolina*

October 21, 2024

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Cassiopia Rhoads v. Aiken County Sheriff's Office  
Appellate Case No. 2024-000592  
Civil Action Number: 2020-CP-02-2238  
Claim Number: 2020G00077  
Our File Number: 333.20304

Dear Ms. Kitchings:

Pursuant to Section (b)(2) the Supreme Court's Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), please find enclosed for filing the **Notice of Conditional Cross-Appeal** with regard to the above referenced matter. My firm's check for the \$250.00 filing fee will be mailed to the Court pursuant to Section (c) of the same Supreme Court Order.

By copy of this letter, I am serving a copy on all counsel of record by email only pursuant to Section (d)(1) of the same Supreme Court Order. If you have any questions, please advise.

Thank you for your assistance.

Sincerely,

LINDEMANN LAW FIRM, P.A.

A handwritten signature in blue ink, appearing to read 'A. Lindemann', is written over a light blue horizontal line.

Andrew F. Lindemann

AFL/jmb  
Enclosure

cc: Francis M. Hinson, IV, Esquire (*w/ Enclosure, Via Email Only*)  
Patrick J. McLaughlin, Esquire (*w/ Enclosure, Via Email Only*)