

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE  
Case No. 2024-CP-23-03730

Jennifer L. Browning and Browning  
Geriatric Consulting, LLC, .....Respondent,

v.

Paul Hulsey, Cherie Durand, Kimberly  
Thomason, Devon Puriefoy, Desa Ballard,  
Mayra Michalski, Luis Michalski,  
Margaret Miniard, Stacey Grist and  
John & Jane Does #1-14, Defendants,

Of which Paul Hulsey, Cherie Durand, Kimberly  
Thomason, Devon Puriefoy, Desa Ballard,  
Mayra Michalski, Luis Michalski,  
Margaret Miniard, Stacey Grist are the, ..... Appellants

AMENDED  
NOTICE OF APPEAL

Appellants Paul Hulsey, Cherie Durand, Kimberly Thomason, Devon Puriefoy, Desa Ballard, Mayra Michalski, Luis Michalski, Margaret Miniard, and Stacey Grist (hereafter “Appellants”) appeal from the trial court’s Form 4 Orders denying Defendants’ Motions to Dismiss that were filed on October 2, 2024, which were received by Appellants on October 2, 2024. Copies of the Orders are attached as **Exhibit A**. Appellants also appeal the Final Order Regarding Motion to Reconsider that was filed November 27, 2024, which was received by Appellants on November 27, 2024. A copy of the order is attached hereto as **Exhibit B**. On November 4, 2024, Appellants filed a Petition to the Chief Justice of the South Carolina Supreme Court requesting that the trial

court matter be reassigned to another judge due to demonstrable unfair bias towards Appellants. Appellants assert that the trial court's Order dated November 27, 2024, should not have been issued while the Petition was still pending. A copy of the Petition is attached hereto as **Exhibit C**.

Respectfully submitted,

s/ Haley Hubbard

Harvey M. Watson III (S.C. Bar No. 74053)  
Haley Hubbard (S.C. Bar No. 103195)

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ATTORNEYS FOR APPELLANTS

December 30, 2024

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ATTORNEY FOR RESPONDENTS

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE  
Case No. 2024-CP-23-03730

Jennifer L. Browning and Browning  
Geriatric Consulting, LLC, ..... Respondent,

v.

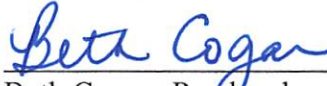
Paul Hulseley, Cherie Durand, Kimberly  
Thomason, Devon Puriefoy, Desa Ballard,  
Mayra Michalski, Luis Michalski,  
Margaret Miniard, Stacey Grist and  
John & Jane Does #1-14, Defendants,

Of which Paul Hulseley, Cherie Durand, Kimberly  
Thomason, Devon Puriefoy, Desa Ballard,  
Mayra Michalski, Luis Michalski,  
Margaret Miniard, Stacey Grist are the, ..... Appellants

**PROOF OF SERVICE**

I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on December 30, 2024, I served a copy of the **Amended Notice of Appeal**, in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

**Beattie B. Ashmore, Esquire**  
**Beattie B. Ashmore, PA**  
**Beattie@BeattieAshmore.com**

  
\_\_\_\_\_  
Beth Cogan, Paralegal

December 30, 2024

## Beth Cogan

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**From:** Beth Cogan  
**Sent:** Monday, December 30, 2024 1:40 PM  
**To:** beattie@beattieashmore.com; Rhonda Bell  
**Cc:** Haley Hubbard; Jessie Carroll  
**Subject:** RE: (Jennifer L Browning , plaintiff, et al vs. Paul Hulse , defendant, et al 2024-CP-23-03730) Ltr to COA encl Amended NOA  
**Attachments:** 2024 12 30 Ltr to COA encl Amended NOA.pdf; 2024 12 30 Amended NOA.pdf; A-Form 4.pdf; B-2024 11 27 (filed) Final Order Regarding MTR (Browning).pdf; C-2024 11 04 Petition to Chief Justice.pdf; 2024 12 30 POS Amended NOA.pdf

Hope you had a great weekend. We are filing the attached Amended Notice of Appeal today for the above-referenced matter.

Kindest Regards,  
-Beth

Beth Cogan, Paralegal  
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**From:** Beth Cogan <Beth@desaballard.com>  
**Sent:** Friday, December 27, 2024 3:45 PM  
**To:** beattie@beattieashmore.com; Rhonda Bell <rhonda@beattieashmore.com>  
**Cc:** Haley Hubbard <haley@desaballard.com>; Jessie Carroll <jessie@truluckthomason.com>  
**Subject:** (Jennifer L Browning , plaintiff, et al vs. Paul Hulse , defendant, et al 2024-CP-23-03730) Ltr to COA encl NOA

Good afternoon,  
Please see the attached Notice of Appeal that is being filed today for the above-referenced matter.

Kindest Regards,  
-Beth

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**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

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Harvey M Watson III  
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December 30, 2024

Via Email ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))  
The Honorable Jenny Abbot Kitchings  
Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
**Dec 30 2024**  
**SC Court of Appeals**

Re: *Jennifer Browning, et al. v. Paul Hulse, et. al.*  
Case No.: 2024-CP-23-03730

Dear Ms. Kitchings:

Enclosed for filing, please find an Amended Notice of Appeal and Proof of Service for the above-referenced matter. Upon reviewing the documentation submitted in this matter, it has come to our attention that the Form 4 order of October 2, 2024 was inadvertently omitted. To rectify this error, we kindly request that the omitted order be added to the appeal.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent and is being filed with the Trial Court. If you have any questions, please do not hesitate to contact our office. With warm personal regards, I am,

Sincerely yours,

*Haley A. Hubbard*

Haley Hubbard  
[haley@desaballard.com](mailto:haley@desaballard.com)

Enclosures

cc: Via Email  
Beattie B. Ashmore, Esquire  
Paul Hulse, Esquire  
Cherie Durand, Esquire  
Kimberly Thomason, Esquire  
Devon Puriefoy, Esquire  
Desa Ballard, Esquire  
Mayra Michalski  
Luis Michalski  
Stacey Grist  
Margaret Miniard