

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Case No. 2024-CP-23-03329

Joseph M. Plaxco,Respondent,

v.

Paul Hulsey, Cherie Durand, Kimberly
Thomason, Devon Puriefoy, Desa Ballard,
Mayra Michalski, Luis Michalski,
And John & Jane Does #1-14, Defendants,

Of which Paul Hulsey, Cherie Durand, Kimberly
Thomason, Devon Puriefoy, Desa Ballard,
Mayra Michalski, Luis Michalski, are the, Appellants

NOTICE OF APPEAL

Appellants Paul Hulsey, Cherie Durand, Kimberly Thomason, Devon Puriefoy, Desa Ballard, Mayra Michalski, Luis Michalski, (hereafter “Appellants”) appeal from the trial court’s 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 A**. 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 B**.

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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December 27, 2024

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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Case No. 2024-CP-23-03329

Joseph M. Plaxco, Respondent,

v.

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

Of which Paul Hulsey, Cherie Durand, Kimberly
Thomason, Devon Puriefoy, Desa Ballard,
Mayra Michalski, Luis Michalski are the, Appellants

PROOF OF SERVICE

I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on December 27, 2024, I served a copy of the **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:

Carter Massingill, Esquire
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John T. Lay, Esquire
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Beth Cogan, Paralegal

December 27, 2024

Beth Cogan

From: Beth Cogan
Sent: Friday, December 27, 2024 4:18 PM
To: Carter Massingill; jlay@gwblawfirm.com; iconits@gwblawfirm.com; apalmieri@gwblawfirm.com
Cc: Haley Hubbard; Jessie Carroll
Subject: (Joseph M. Plaxco v. Paul Hulseley, et al 2024-CP-23-03329) Ltr to COA encl NOA
Attachments: 2024 12 27 Ltr to COA encl Notice of appeal.pdf; 2024 12 27 NOA.pdf; A-2024 11 27 (filed) Flnal Order Regarding MTR (Plaxco).pdf; B-2024 11 04 Petition to Chief Justice.pdf; 2024 12 27 POS NOA.pdf

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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December 27, 2024

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

RECEIVED
Dec 27 2024
SC Court of Appeals

Re: Joseph M. Plaxco v. Paul Hulsey, et. al.
Case No.: 2024-CP-23-03329

Dear Ms. Kitchings:

Enclosed for filing, please find a Notice of Appeal and Proof of Service for the above-referenced matter. Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021) a check for the filing fee is being forwarded separately via US mail.

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

Enclosures

cc: Via Email
Carter Massingill, Esquire
John T. Lay, Esquire
Ioannis "Ian" G. Conits, Esquire
Paul Hulsey, Esquire
Cherie Durand, Esquire
Kimberly Thomason, Esquire
Devon Puriefoy, Esquire
Desa Ballard, Esquire
Jessie Carroll, Esquire
Mayra Michalski
Luis Michalski