

RECEIVED

Dec 27 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Case No. 2024-CP-23-03236

Roland O’Neil Rabon, Jr.,.....Respondent,

v.

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

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

NOTICE OF APPEAL

Appellants Paul Hulsey, Cherie Durand, Kimberly Thomason, Devon Puriefoy, Desa Ballard, Mayra Michalski, Margaret Ann Miniard, (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)

BALLARD & WATSON

226 State Street

West Columbia, SC 29169

Telephone 803.796.9299

Facsimile 803.796.1066

harvey@desaballard.com

haley@desaballard.com

ATTORNEYS FOR APPELLANTS

December 27, 2024

Other counsel of record:

Lane W. Davis

MAYNARD NEXSEN PC

104 S. Main Street, Suite 900

Greenville, South Carolina 29601

Telephone 864.370.2211

LDavis@maynardnexsen.com

ATTORNEY FOR RESPONDENT

RECEIVED

Dec 27 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Case No. 2024-CP-23-03236

Roland O’Neil Rabon, Jr., Respondent,

v.

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

Of which Paul Hulsey, Cherie Durand, Kimberly
Thomason, Devon Puriefoy, Desa Ballard,
Mayra Michalski, Margaret Ann Miniard, 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:

Lane Davis, Esquire
MAYNARD NEXSEN PC
LDavis@maynardnexsen.com



Beth Cogan, Paralegal

December 27, 2024

Beth Cogan

From: Beth Cogan
Sent: Friday, December 27, 2024 4:26 PM
To: ldavis@maynardnexsen.com; FSmith@maynardnexsen.com
Cc: Haley Hubbard; Jessie Carroll
Subject: (Rabon v. Hulsey, et al. 2024-CP-23-03236) Ltr to COA encl NOA
Attachments: 2024 12 27 Ltr to COA encl Notice of appeal.pdf; 2024 12 27 Notice of Appeal.pdf; A-2024 11 27 (filed) Final Order Regarding MTR.pdf; B-2024 11 04 Petition to Chief Justice.pdf; 2024 12 27 POS NOA.pdf

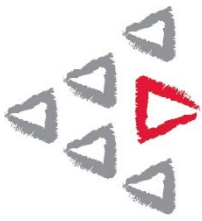
Good afternoon,

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

Kindest Regards,

-Beth

Beth Cogan, Paralegal
Ballard & Watson, Attorneys at Law
226 State Street
West Columbia, South Carolina 29169
803.796.9299
803.796.1066 Facsimile
beth@desaballard.com
www.desaballard.com



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M Watson III
Haley Hubbard

226 State Street West Columbia, SC 29169
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

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

Re: Roland O'Neil Rabon, Jr. v. *Paul Hulsey, et. al.*
Case No.: 2024-CP-23-03236

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 Hubbard
haley@desaballard.com

Enclosures

cc: Via Email
Lane Davis, Esquire
Paul Hulsey, Esquire
Cherie Durand, Esquire
Kimberly Thomason, Esquire
Devon Puriefoy, Esquire
Desa Ballard, Esquire
Jessie Carroll, Esquire
Mayra Michalski
Margaret Ann Miniard