

RECEIVED

Jan 14 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS

Benjamin H. Culbertson, Presiding Circuit Judge

Case No. 2015-CP-26-01729

Summit Shores Lender, LC.....Respondent,

v.

Palmetto Interstate Development II, Inc.,

and Leonard Ray Watts.....Appellants.

NOTICE OF APPEAL

Palmetto Interstate Development II, Inc. and Leonard Ray Watts, by and through their undersigned Counsel, hereby appeal the final decision of the Honorable Benjamin H. Culbertson, Presiding Circuit Judge, Court of Common Pleas, Horry County, dated October 14, 2024, being the *Order Denying Defendants’ Motion to Bar Enforcement of Plaintiff’s Mortgage* (attached hereto as Exhibit A) and *Order Denying Defendants’ Motion for Reconsideration dated December 17, 2024* (attached hereto as Exhibit B).

Respectfully submitted,

/s/ James Marshall Biddle

Conway, South Carolina

January 14, 2025

James Marshall Biddle, SC Bar No. 69471
Biddle Law Firm LLC
311-A Beaty Street
Conway, SC 29526
Phone: 843-903-1600
Email: marshall@biddlelawfirm.net

/s/ Franklin Ogele
Franklin Ogele, Esq.
NJ Bar No. 002521990
Admitted Pro Hac Vice
Franklin Ogele, P.A.
One Gateway Center, 26th FL
Newark, NJ 07102
Phone: 973-277-4239
Email: fogele@msn.com

ATTORNEYS FOR THE APPELLANTS

Other Counsel of Record:

Demetri K. Koutrakis, Esquire
Calliston Tighe & Robinson
1812 Lincoln Street, Suite #200
P. O. Box 1390
Columbia SC 29202-1390

Brian W. Zimmerman, Esquire
Spencer Fane LLP
3040 Post Oak Boulevard, Suite #1300
Houston, TX 77056

RECEIVED
Jan 14 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS
Benjamin H. Culbertson, Presiding Circuit Judge

Case No. 2015-CP-26-01729

Summit Shores Lender, LC.....Respondent,

v.

Palmetto Interstate Development II, Inc.,
and Leonard Ray Watts.....Appellants.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal to the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid on January 14, 2025 and addressed as follows:

Demetri K. Koutrakis, Esquire
Calliston Tighe & Robinson
1812 Lincoln Street, Suite #200
P. O. Box 1390
Columbia SC 29202-1390

Brian W. Zimmerman, Esquire
Spencer Fane LLP
3040 Post Oak Boulevard, Suite #1300
Houston, TX 77056

Biddle Law Firm, LLC

/s/ James Marshall Biddle
James Marshall Biddle, SC Bar No. 69471
Biddle Law Firm LLC
311-A Beaty Street
Conway, SC 29526
Phone: 843-903-1600
Email: marshall@biddlelawfirm.net

/s/ Franklin Ogele
Franklin Ogele, Esq.
NJ Bar No. 002521990
Admitted Pro Hac Vice
Franklin Ogele, P.A.
One Gateway Center, 26th FL
Newark, NJ 07102
Phone: 973-277-4239
Email: fogele@msn.com

Attorneys for Appellants

Conway, South Carolina
January 14, 2025

J. Marshall Biddle
marshall@biddlelawfirm.net

311 BEATY STREET, SUITE A
CONWAY, SOUTH CAROLINA 29526
TELEPHONE (843) 903-1600

BIDDLE LAW FIRM, LLC

ATTORNEY AND COUNSELOR AT LAW

www.biddlelawfirm.net

POST OFFICE BOX 1119
CONWAY, SOUTH CAROLINA 29528
FACSIMILE (843) 903-6209

January 14, 2025

VIA EMAIL & US MAIL

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

Re: Summit Shores Lender, LLC v. Palmetto Interstate Development II, Inc.
Civil Action No. 2015-CP-26-01729

Dear Ms. Kitchings:

Regarding the above-referenced matter, enclosed please find a Notice of Appeal (with exhibits), Proof of Service, and my firm's check in the amount of \$250.00 for the filing fee.

Should you have any questions or need any additional information regarding the enclosed, please do not hesitate to contact me. Thank you for your assistance with this matter.

Yours very truly,
Biddle Law Firm, LLC

James Marshall Biddle

James Marshall Biddle

cc: The Honorable Renee Elvis
Franklin Ogele, Esquire
Demetri K. Koutrakis, Esquire
Brian W. Zimmerman, Esquire

RECEIVED
Jan 14 2025
SC Court of Appeals