

RECEIVED
Feb 03 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002187

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

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

And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002199

Clayton L. Jennings, ... Respondent,

v.

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

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

And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002201

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

And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002202

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

And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Case No. 2024-002206

Fred W. “Trey” Suggs III.....Respondent,

v.

Paul Hulsey, Cherie Durand, Kimberly
Thomason, Devon Puriefoy, & Desa Ballard, ... Appellants

**REPLY TO RETURN TO
MOTION TO REINSTATE APPEAL**

Appellants submit the following in reply to the return and opposition to the Motion to Reinstate Appeal.

On January 24, 2025, Judge Gravely issued an Order, *sua sponte*, staying the proceedings in each of the trial court matters during the pendency of Appellant’s Petition to the Chief Justice of the South Carolina Supreme Court. A copy of the Orders are attached hereto as **Exhibit A**. These Orders come ahead of a motions hearing in the trial court matters scheduled for later in February, demonstrating the trial court’s recognition of the efficacy of the Petition as affecting the trial court proceedings. This further supports Appellants’ assertion that the orders from which this appeal originated should not have been issued while the Petition was pending.

Accordingly, Appellants respectfully request this Court reinstate the previously dismissed appeals for further determination of the appropriateness of Judge Salvini’s ruling during the pendency of Appellants’ Petition to the Chief Justice of the South Carolina Supreme Court.

Respectfully submitted,

s/ Haley Hubbard

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

Haley Hubbard (S.C. Bar No. 103195)

BALLARD & WATSON

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harvey@desaballard.com

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ATTORNEYS FOR APPELLANTS

February 3, 2025

Exhibit A

STATE OF SOUTH CAROLINA	)	IN THE COURT OF GENERAL SESSIONS
COUNTY OF GREENVILLE	)	THIRTEENTH JUDICIAL CIRCUIT
Roland O’Neil Rabon, Jr.,	)	
	)	
Plaintiff,	)	
	)	
Vs.	)	
	)	
Paul Hulsey, Cherie Durand, Kimberly	)	Case # 2024-CP-23-03236
Thomason, Devon Puriefoy, Desa Ballard,	)	
Stacey Grist, Mayra Michalski,	)	
Margaret Ann Miniard, and John & Jane	)	
Does #1-14,	)	
	)	
Defendants.	)	

ORDER TO STAY ALL PROCEEDINGS

	)	
Fred W. “Trey” Suggs, III.,	)	
	)	
Plaintiff,	)	Case # 2024-CP-23-03258
	)	
Vs.	)	
	)	
Paul Hulsey, Cherie Durand, Kimberly	)	
Thomason, Devon Puriefoy, Desa Ballard	)	
	)	
Defendants.	)	

	)	
Clayton L. Jennings,	)	
	)	
Plaintiff,	)	Case # 2024-CP-23-03271
	)	
Vs.	)	
	)	
Paul Hulsey, Cherie Durand, Kimberly	)	
Thomason, Devon Puriefoy, Desa Ballard,	)	
Stacey Grist, Margaret Ann Miniard,	)	
and John & Jane Does #1-14,	)	
	)	
Defendants.	)	

Joseph M. Plaxco,)
)
)
 Plaintiff,)
)
 Vs.)
)
 Paul Hulsey, Cherie Durand, Kimberly)
 Thomason, Devon Puriefoy, Desa Ballard,)
 Mayra Michalski, Luis Michalski,)
 and John & Jane Does #1-14,)
)
 Defendants.)

Case # 2024-CP-23-03329

Jennifer L. Browning and Browning,)
 Geriatric Consulting, LLC.,)
)
 Plaintiff,)
)
 Vs.)
)
 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.)

Case # 2024-CP-23-03730

Since a Petition is currently pending before the Chief Justice of South Carolina Supreme Court requesting that these cases be assigned to a specific Judge, the undersigned Judge as Chief Administrative Judge for Common Pleas orders that these matters be stayed until such time that a ruling has been issued by the Chief Justice or South Carolina Supreme Court.

IT IS SO ORDERED.

E-signature of Judge Gravely to follow



Greenville Common Pleas

Case Caption: Jennifer L Browning , plaintiff, et al vs. Paul Hulsey , defendant, et al

Case Number: 2024CP2303730

Type: Order/Stay

So Ordered

s/ Honorable Perry H. Gravely, #2755

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Mayra Michalski, Luis Michalski,
Margaret Miniard, Stacey Grist and
John & Jane Does #1-14, Defendants,

Of which Paul Hulsey, Cherie Durand, Kimberly
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And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002199

Clayton L. Jennings, ... Respondent,

v.

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

Of which Paul Hulsey, Cherie Durand, Kimberly
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And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002201

Joseph M. Plaxco, ...Respondent,

v.

Paul Hulsey, Cherie Durand, Kimberly
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And

APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Appellate Case No. 2024-002202

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
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APPEAL FROM GREENVILLE COUNTY
JESSICA ANN SALVINI, CIRCUIT COURT JUDGE
Case No. 2024-002206

Fred W. “Trey” Suggs III.....Respondent,

v.

Paul Hulsey, Cherie Durand, Kimberly
Thomason, Devon Puriefoy, & Desa Ballard, ... Appellants

PROOF OF SERVICE

I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on February 3, 2025, I served a copy of the **Reply to Return to Motion to Reinstate 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:

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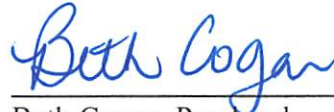
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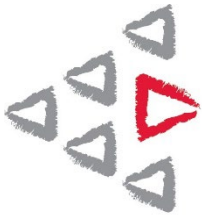
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Beth Cogan, Paralegal

February 3, 2025



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

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Harvey M Watson III
Haley Hubbard

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February 3, 2025

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: *Jennifer Browning, et al. v. Paul Hulsey, et. al.* (2024-002187)
Clayton Jennings, et al. v. Paul Hulsey, et. al. (2024-002199)
Joseph M. Plaxco v. Paul Hulsey, et. al. (2024-002201)
Roland O'Neil Rabon, Jr. v. Paul Hulsey, et. al. (2024-002202)
Fred W. Suggs III v. Paul Hulsey, et. al. (2024-002206)

Dear Ms. Kitchings:

Enclosed for filing, please find a Reply to Return to Motion to Reinstate Appeal and Proof of Service for the above-referenced matters. By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondents. 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
Beattie B. Ashmore, Esquire
Carter Massingill, Esquire
John T. Lay, Esquire
Ioannis "Ian" G. Conits, Esquire
Lane Davis, Esquire
Samuel W. Outten, Esquire
Megan Rushton, Esquire
Paul Hulsey, Esquire
Cherie Durand, Esquire
Kimberly Thomason, Esquire
Devon Puriefoy, Esquire
Desa Ballard, Esquire
Mayra Michalski
Luis Michalski
Stacey Grist
Margaret Miniard

Feb 03 2025