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Mar 19 2025

SC Court of Appeals

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM COUNTY OF CHARLESTON
Court of Common Pleas

Special Referee John A. Massalon

Common Pleas Case No.: 2016-CP-10-03328

James Ronald McCollum,

Appellant,

v.

Victor Apat,

Respondent.

NOTICE OF APPEAL

James Ronald McCollum, by and through their counsel, appeals the Order of the Special Referee John A. Massalon, dated February 19, 2025, denying the Motion to Alter or Amend the Order of the Special Referee dated June 11, 2024. Appellant received written notice of entry of this Order on February 19, 2025. Additionally, James Ronald McCollum appeals the Order of the Special Referee John A. Massalon dated June 11, 2024. Appellant received written notice of entry of this Order on June 11, 2024.

[SIGNATURE PAGE BELOW]

FERRARA LAW FIRM, PLLC,

/s/ Paul B. Ferrara, III

Paul B. Ferrara, III (S.C. Bar No. 70511)

8887 Old University Blvd.,

North Charleston, SC 29406

T: (843) 569-5511 | F: (843) 569-5411

paul@ferraralawfirm.net

Attorney for Appellant

March 19, 2025
North Charleston, SC

Other Counsel of Record:

John A. Massalon, Esquire
Wills, Massalon & Allen, LCC
97 Broad Street
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jmassalon@wmalawfirm.net

Robert T. Lyles, Jr. Esquire
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Eric B. Laquiere, Esquire
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3674 Old Charleston Highway
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PROOF OF SERVICE

I certify that I have served a copy of the notice of appeal by emailing a copy to Special Referee John. A Massalon at imassalon@wmalawfirm.net, Eric B. Laquiere at eric@laqlaw.com, and Robert T. Lyles, Jr. at rtl@lylesfirm.com on March 18, 2025.

/s/ Paul B. Ferrara, III

Paul B. Ferrara, III

SC Bar No. 70511

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Attorney for Appellant

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THE STATE OF SOUTH CAROLINA
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APPEAL FROM COUNTY OF CHARLESTON
Court of Common Pleas

Special Referee John A. Massalon

Common Pleas Case No.: 2016-CP-10-3328

James Ronald McCollum,

Appellant,

v.

Victor Apat,

Respondent.

CERTIFICATE OF SERVICE

This is to certify that the undersigned has served this Notice of Appeal in the above-captioned action upon the Respondent via electronic service at the addresses shown below on March 19, 2025:

Robert T. Lyles, Jr. Esquire
Lyles & Lyles, LLC
342 East Bay Street
Charleston, SC 29401
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Attorney for Victor Apat

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Attorney for CSG

[SIGNATURE BLOCK BELOW]

March 19, 2025
North Charleston, South Carolina

/s/ Alexander James Cullen
Alexander J. Cullen, Law Clerk

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SC Court of Appeals

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*Paul B. Ferrara, III**
*Janel K. Ferrara**

**(also Admitted in N.C.)*

March 19, 2025

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: The CSG, Inc. v. Apat, et. al.
Appellate Case No.: 2025-_____
Case No.: 2016-CP-10-03328
Our File No.: 17-600

Dear Ms. Kitchings:

Please be advised that my client, James Ronald McCollum has appealed Special Referee Massalon's Orders filed June 11, 2024, and February 19, 2025. Please find attached the filed Notice of Intent to Appeal, Notice of Appeal, and proof of service. Our firm has enclosed a check in the amount of \$250.00 for the filing fee required with the Notice of Appeal that was filed on March 19, 2025. Kindly, e-file these documents and returned a clocked copy via email.

Sincerely,

FERRARA LAW FIRM, PLLC,



Paul B. Ferrara, III

Enclosures: as stated