

RECEIVED

Mar 19 2025

SC Court of Appeals

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

Victor ApatAppellant,

v.

The Construction Services Group Inc. and James Ronald McCollum Respondents.

NOTICE OF INTENT TO APPEAL

Victor Apat, by and through his counsel, hereby appeals the *Orders* of the Special Referee John A. Massalon, dated June 11, 2024 (attached as Exhibit A), and the Order of the Special Referee filed February 19, 2025, denying the Motion to Alter or Amend the Order of the Special Referee dated June 11, 2024 (attached as Exhibit B). Appellant received written notice of entry of this final Order on February 19, 2025.

s/Robert T. Lyles, Jr.

Robert T. Lyles, Jr. (SC Bar #10299)
Lyles & Associates, LLC
1037 Chuck Dawley Blvd., Suite G-100
Mt. Pleasant, SC 29464
843.577.7730
rtl@lylesfirm.com
Attorneys for Appellant

Other Counsel of Record:

Paul B. Ferrara, III (SC Bar # 70511)
Ferrara Law Firm, PLLC
8887 Old University Blvd.
North Charleston, SC 29406
843.569.5511
paul@ferraralawfirm.net

Eric B. Laquiere (SC Bar #71177)
Laquiere Law Firm
3674 Old Charleston Highway
Johns Island, SC 29455
eric@laqlaw.com

John A. Massalon
Wills, Massalon & Allen, LCC
97 Broad Street
Charleston, SC 29401
jmassalon@wmalawfirm.net

RECEIVED

Mar 19 2025

SC Court of Appeals

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

Victor ApatAppellant,

v.

James Ronald McCollum.....Respondent.

PROOF OF SERVICE

I certify that I have served Appellant's Notice of Intent to Appeal to the following counsel of record via electronic mail on March 19, 2025, as follows:

Paul B. Ferrara, III (SC Bar # 70511)
Ferrara Law Firm, PLLC
8887 Old University Blvd.
North Charleston, SC 29406
843.569.5511
paul@ferraralawfirm.net

Eric B. Laquiere (SC Bar #71177)
Laquiere Law Firm
3674 Old Charleston Highway
Johns Island, SC 29455
eric@laqlaw.com

John A. Massalon
Wills, Massalon & Allen, LCC
97 Broad Street
Charleston, SC 29401
jmassalon@wmalawfirm.net

s/Robert T. Lyles, Jr.

Robert T. Lyles, Jr. (SC Bar #10299)

Lyles & Associates, LLC

1037 Chuck Dawley Blvd., Suite G-100

Mt. Pleasant, SC 29464

843.577.7730

rtl@lylesfirm.com

Attorneys for Appellant

RECEIVED

Mar 19 2025

SC Court of Appeals



LYLES & ASSOCIATES, LLC
ATTORNEYS AT LAW
www.lylesfirm.com

Robert T. Lyles, Jr.
Member

Reply to: Main Office
E-mail: rtl@lylesfirm.com

March 19, 2025

VIA E-MAIL & U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Victor Apat v. The Construction Services Group, Inc. and James Ronald McCollum*
Charleston County Case No.: 2016-CP-10-03328

Dear Ms. Kitchings:

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

Additionally, a copy of the enclosed has been e-filed with the Charleston County Clerk of Court.

Should you have any questions regarding the enclosed, please give me a call.

Thank you for your assistance, and with kindest regards, I am

Very truly yours,

LYLES & ASSOCIATES, LLC

Robert T. Lyles, Jr.

RTL/cw

Enclosures

cc: The Honorable Julie J. Armstrong (Via E-Filing)
Eric B. Laquere, Esquire
Paul Ferrara, Esquire
John A. Massalon, Esquire