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Mar 31 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Richland County
Court of Common Pleas

The Hon. Patrick C. Fant, III

Civil Action No. 2024-CP-40-00827

Ann Marie Watson.....Appellant

v.

Kellum W. Allen.....Respondent

NOTICE OF APPEAL

Ann Marie Watson hereby appeals the following Orders of the Honorable Patrick C. Fant: (1) an Order dated January 27, 2025, that is attached hereto as Exhibit A; and (2) an Order dated March 25, 2025, that is attached hereto as Exhibit B. Appellant received written notice of the entry of each Order on the date stamped on each respective Order's margin.

Separately, and by U.S. Mail, Appellant has submitted the filing fee to the Clerk of the Court of Appeals.

Respectfully submitted,

/s/ Robert P. Wood

Robert P. Wood, SC Bar No. 6206
ROGERS TOWNSEND, LLC
1221 Main Street, 14th Floor
PO Box 100200 (29202)
Columbia SC 29201
(803) 771-7900 – Telephone
(803) 343-7017 - Fax
robert.wood@rogerstowndsend.com
Attorneys for Appellant, Ann Marie Watson

Filed this 31st day of March, 2025.

Other Counsel of Record:

James Randall Davis, Esq. (S.C. Bar No. 1580)
Davis Frawley, LLC
140 East Main Street (29072)
Post Office Box 489
Lexington, South Carolina 29071
(803) 359-2512
Randy@OldCourthouse.com

Attorneys for Respondent, Kellum W. Allen

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PROOF OF SERVICE

The undersigned counsel for Appellant hereby certifies, subject to penalty of perjury, that the following documents were served upon the following counsel of record by the following means on the date identified below.

Please be advised that Appellant's filing fee in connection with this appeal is being sent by U.S. Mail to the Office of the Clerk of the Court of Appeals, consistent with Supreme Court Order 2020-05-29-02.

Documents: Notice of Appeal with Exhibits A and B

Counsel Served: For Respondent Kellum W. Allen
James Randall Davis, Esq. (S.C. Bar No. 1580)
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Means of Delivery: Via Email Only

Courts Served: Office of the Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Means of Delivery: Notice of Appeal filed via ctappfilings@sccourts.org
Associated filing fee via U.S. Mail

Date: March 31, 2025.

Respectfully submitted,

/s/ Robert P. Wood

Robert P. Wood, SC Bar No. 6206
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Attorneys for Appellant, Ann Marie Watson



******* IMPORTANT NOTICE - READ THIS INFORMATION *******
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2024CP4000827

Official File Stamp: 03-31-2025 02:30:47 PM
Court: CIRCUIT COURT
Common Pleas
Richland
Case Caption: Kellum W Allen vs Ann Marie Watson
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
- Exhibit/Filing of Exhibits
- Exhibit/Filing of Exhibits
Filed by or on behalf of: Robert P. Wood

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Robert P. Wood for Ann Marie Watson
James Randall Davis for Kellum W Allen

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Jennifer L. Tucker

From: Jennifer L. Tucker
Sent: Monday, March 31, 2025 3:30 PM
To: Randy Davis; Nicole Price
Cc: Robert P. Wood; Jennifer L. Tucker
Subject: Kellum Allen vs. Ann Marie Watson / Service of Notice of Appeal
Attachments: PLD Notice of Appeal filed with lower court on 03_31_2025.PDF; Notice of Appeal - Court of Appeals.pdf; Exhibit B to Notice of Appeal.pdf; Exhibit A to Notice of Appeal.pdf; NEF.pdf

Mr. Davis,

Please find attached the Notice of Appeal along with Exhibits A and B that was filed with the lower court a few minutes ago. I have also attached the following for your review:

1. Notice of Appeal to be filed with the Court of Appeals
2. Exhibit A to Notice of Appeal
3. Exhibit B to Notice of Appeal
4. Proof of Service of Notice of Appeal
5. NEF (Notice of Electronic Filing) of the Notice of Appeal

Please let me know if you have any questions on the attached.

Thank you,



Jennifer L. Tucker
Litigation Paralegal

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