

**RECEIVED**

**Apr 29 2025**

**SC Court of Appeals**

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM MARION COUNTY  
Court of Common Pleas

---

Thomas L. Hughston, Circuit Court Judge

---

Case No.: 2020-CP-33-00277

Appellate Case No.: 2024-000632

Bevance Lynch,

Respondent,

v.

Bertha E. Dunham,

Appellant.

---

**PROOF OF SERVICE**

---

I certify that I have served a copy of the record on appeal and Final Brief of Appellant by emailing a copy to Mr. Jake Kennedy Esq. at [jake@kennedysc.com](mailto:jake@kennedysc.com), on April 7, 2025. Moreover, the cover page to the Record on Appeal was updated and sent to the Court of Appeals on April 19, 2025.

/s Paul B. Ferrara, III

Paul B. Ferrara, III

SC Bar No. 70511

8887 Old University Blvd. Suite 200

North Charleston, SC 29406

(843) 569-5511/ (843) 569-5411 fax

[paul@ferraralawfirm.net](mailto:paul@ferraralawfirm.net)

Attorney for Appellant

Other Counsel of Record:

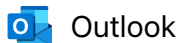
Joseph J. Kennedy,

Esq.

200 E Dozier St

Marion, SC 29571

Attorney for Respondent



---

**2024-00632/ Record on Appeal & Final Brief of Appellant**

---

**From** Paul Ferrara <paul@ferraralawfirm.net>  
**Date** Mon 4/7/2025 11:47 PM  
**To** Court Of (Other) <ctappfilings@sccourts.org>; jake@kennedysc.com <jake@kennedysc.com>

2 attachments (9 MB)

Part 1 of 5 - ROA-combined-compressed.pdf; final Brief of Appellant - Belin (1) (1).pdf;

Dear Clerk,

Can you please e-file the attached? The original record on appeal and final brief of Appellant have been mailed to the court for filing.

Sincerely,  
Paul B. Ferrara, III

8887 Old University Blvd., Ste. 201  
N. Charleston, SC 29406  
(843) 569-5511 (office)  
(843) 569-5411 (fax)

This e-mail and the information transmitted is PRIVILEGED and CONFIDENTIAL information and is the property of the sender. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this information, or the taking of any action in reliance on the content of this information is strictly prohibited. If you have received this email in error, please immediately contact Paul B. Ferrara III with Ferrara Law Firm, PLLC at (843) 569-5511 and please delete the original transmittal of this information.

---

**From:** Paul Ferrara  
**Sent:** Monday, April 7, 2025 2:38 PM  
**To:** Bill Carl (Other) <gsisc.prints@gmail.com>  
**Cc:** Paul Ferrara III <paulferrara3@icloud.com>  
**Subject:** Record on Appeal-White cover;

Bill,

RECEIVED

Apr 29 2025

SC Court of Appeals

**Ferrara Law Firm, PLLC**

8887 Old University Blvd. Ste. 200  
North Charleston, SC 29406  
(843) 569-5511 / Fax (843) 569-5411

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

\*(also Admitted in N.C.)

April 17, 2025

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

Re: Bevance Lynch v. Bertha E. Dunham  
Appellate Case No2025-000632  
Our File No.: 19-561

Dear Ms. Kitchings:

Please find enclosed the corrected Record on Appeal for the above referenced case for filing. I submitted an electronic copy through the C-Track filing portal.

Sincerely,

FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III

Enclosures

Cc: Jack Kennedy via email