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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Circuit Court

APPEAL FROM CHARLESTON CIRCUIT COURT

Mikell Scarborough, Circuit Court Judge

Circuit Court Case No.: 2015-CP-10-06684  
Appellate Case No.: Pending

Palmetto Contract Services, Inc. ....Appellant,

v.

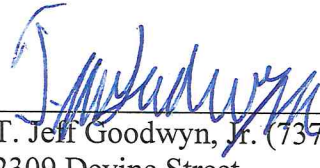
Zurich American Insurance Company of Illinois  
.....Respondent.

NOTICE OF APPEAL

Palmetto Contract Services, Inc., appeals the **Form 4 Order Denying Defendant's Motion for a Continuance** of the Honorable Mikell Scarborough, Circuit Court Judge, dated February 24, 2025, attached hereto, **Order Granting Plaintiff Zurich American Insurance Company of Illinois's Motion for Summary Judgment of All Claims** of the Honorable Mikell Scarborough, Circuit Court Judge, dated June 20, 2025, attached hereto, and **Form 4 Order Granting Plaintiff's Order Denying Defendant's Motion to Alter/Amend the Grant of Summary Judgment in Favor of Plaintiff** of the Honorable Mikell Scarborough, Circuit Court Judge, dated June 26, 2025, attached hereto.

\*\*\*SIGNATURE TO FOLLOW ON NEXT PAGE\*\*\*

**GOODWYN LAW FIRM, LLC**

A handwritten signature in blue ink, appearing to read "T. Jeff Goodwyn, Jr.", is written over a horizontal line.

T. Jeff Goodwyn, Jr. (73789)

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Columbia, SC 29205

(803) 251-4517

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*Attorney for Appellant*

July 2, 2025

Columbia, South Carolina

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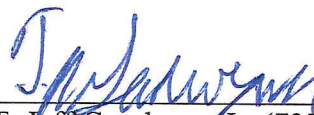
Zurich American Insurance Company of Illinois  
.....Respondent.

**PROOF OF SERVICE**

I certify that I have served a copy of **Appellant's Notice of Appeal** on the following via email address and facsimile on July 2, 2025.

Larry D. Cohen, Esquire Larry D. Cohen, LLC <a href="mailto:ldcohen@ldcohenlaw.com">ldcohen@ldcohenlaw.com</a>	Hon. Mikell R. Scarborough Charleston County Common Pleas (843) 958-5077 Facsimile
Carolyn H. Blue, Esquire <a href="mailto:carolyn.blue@ymail.com">carolyn.blue@ymail.com</a>	

**GOODWYN LAW FIRM, LLC**



T. Jeff Goodwyn, Jr. (73789)  
*Attorney for Appellant*

T. Jeff Goodwyn, Jr.\*†  
Jefferson D. Turnipseed\*\*

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\*Also Licensed in Georgia  
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\*\* Of Counsel

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Web: www.GoodwynLaw.com

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**SC Court of Appeals**

**VIA E-FILING AND MAIL**

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

Re: *Palmetto Contract Services, Inc. v Zurich American Insurance Company of Illionis*  
Case No.: 2015-CP-10-06684  
Appellate Case No.: pending  
Our File No.: 3000-00691


Dear Ms. Kitchings:

Enclosed please find an original and two (2) copies of the Appellant's Notice of Appeal and Proof of Service in regard to the above referenced matter. Please file the original and return a filed copy by email. Additionally, please be advised a check in the amount of \$250.00 has been sent in the mail representing the filing fee.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Notice of Appeal.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: The Honorable Mikell Scarborough (via facsimile)  
Carolyn H. Blue, Esquire (via email)  
Larry D. Cohen, Esquire (via email)