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**Mar 24 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY  
Daniel Coble, Circuit Court Judge  
Case No. 2022-CP-40-01307

Kenneth B. Loveless, .....Appellant,

v.

Kevin Scully, Edward K. White, Flora E. “Beth” Hutchison,  
Michael Montgomery and Beatrice Dennis-White, Defendants,

of which Kevin Scully is the .....Respondent.

**NOTICE OF APPEAL**

Appellant Kenneth B. Loveless appeals multiple issues from the trial court’s Order Partially Dismissing Second Amended Complaint *et al.*, filed February 25, 2026, that was received by Appellant on February 25, 2026. Appellant also appeals from the trial court’s Form 4 Order filed March 16, 2026 denying reconsideration, that was received by appellant on March 16, 2026. Copies of the orders are attached hereto.

s/ Desa Ballard  
Desa Ballard (S.C. Bar No. 498)  
Harvey M. Watson III (S.C. Bar No. 74053)  
Haley Hubbard (S.C. Bar No. 103195)

BALLARD & WATSON  
226 State Street  
West Columbia, SC 29169  
Telephone 803.796.9299  
Facsimile 803.796.1066  
desab@desaballard.com  
harvey@desaballard.com  
haley@desaballard.com

ATTORNEYS FOR APPELLANT

March 24, 2026

Other counsel of record:

Andrew S. Radeker (S.C. Bar No. 73743)  
RADEKER LAW, P.A.  
Post Office Box 6903  
Columbia, South Carolina 29260  
Telephone 803.500.0891  
drew@radekerlaw.com

Taylor M. Smith IV (S.C. Bar No. 101584)  
MERIWETHER LAW, LLC  
923 Calhoun Street  
Columbia, South Carolina 29201  
Telephone 803.779.2211  
taylor@harrisonfirm.com

ATTORNEYS FOR RESPONDENT

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM RICHLAND COUNTY  
Daniel Coble, Circuit Court Judge  
Case No. 2022-CP-40-01307

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Kenneth B. Loveless, ..... Appellant,

v.

Kevin Scully, Edward K. White, Flora E. "Beth" Hutchison,  
Michael Montgomery and Beatrice Dennis-White, Defendants,

of which Beatrice Dennis-White is the ..... Respondent.

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**PROOF OF SERVICE**

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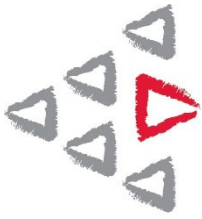
I, Beth Cogan, an employee with Ballard & Watson, do hereby certify that on March 24, 2026, I served a copy of the **Notice of Appeal**, in the above-captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

**Andrew S. Radeker, Esquire**  
**Radeker Law, P.A.**  
**drew@radekerlaw.com**

**Taylor M. Smith IV, Esquire**  
**Meriwether Law, LLC**  
**taylor@harrisonfirm.com**

  
\_\_\_\_\_  
Beth Cogan, Paralegal

March 24, 2026



**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

Desa Ballard  
Harvey M Watson III  
Haley Hubbard

226 State Street West Columbia, SC 29169  
ph 803.796.9299 | fx 803.796.1066 | desaballard.com

March 24, 2026

Via Email ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))  
The Honorable Jenny Abbot Kitchings  
Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: *Kenneth B. Loveless v. Kevin Scully, et. al.*  
Case No.: 2022-CP-40-01307

Dear Ms. Kitchings:

Enclosed for filing, please find a Notice of Appeal and Proof of Service for the above-referenced matter. Pursuant to paragraph (3)(c) of the Supreme Court's amended administrative order dated May 6, 2022 ("Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules" originally dated August 25, 2021) a check for the filing fee is being forwarded separately via US mail.

By copy of this letter and as evidenced by the Proof of Service, this filing has been served upon counsel for the Respondent. If you have any questions, please do not hesitate to contact our office. With warm personal regards, I am,

Sincerely yours,

Desa Ballard  
[desab@desaballard.com](mailto:desab@desaballard.com)

Enclosures

cc: Via Email  
South Carolina Court Administration  
Drew Radeker, Esquire  
Taylor Smith IV, Esquire  
Ken Loveless