

NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Jun 11 2026

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

Civil Action No. 2024-CP-23-04676

Stephanie Levette Cason, Individually and as
Personal Representative of the Estate of
J. D. Pitts-Johnson, a Deceased Minor, and
Rakeem Rashaud Johnson, father of
J.D. Pitts-Johnson, the Deceased Minor, Appellants,

vs.

Greenville City Police Department, Respondent.

NOTICE OF APPEAL

The Appellants, Stephanie Levette Cason, Individually and as Personal Representative of the Estate of J. D. Pitts-Johnson, a Deceased Minor, Rakeem Rashaud Johnson, father of J.D. Pitts-Johnson, the Deceased Minor, hereby file this appeal to appeal the improper ORDER GRANTING DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT and improper ORDER DENYING PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT of Judge G.D. Morgan, Jr. dated June 5, 2026 on a legal issue and question of law.

Date: Thursday, June 11, 2026

Respectfully submitted,
s/ Lola Stradford Richey
Lola Stradford Richey
South Carolina Bar Number: 8931
RICHEY and RICHEY, PA
Post Office Box 10916
Greenville, South Carolina 29603
(864) 467-0503 (Office)
(864) 467-0646 (Facsimile)
lawfirm@richeyandrichey.com
Attorney for the Plaintiff / Appellant

Other Counsels of Record:

V. Clark Price, Attorney

Roni Payne, Attorney

Cassidy Coates Price

1052 North Church Street

Post Office Box 10529

Greenville, South Carolina 29603

EMAIL FOR SERVICE:

Clark Price cprice@cassidycoates.com

Roni Payne rpayne@cassidycoates.com

Traci Larkins tlarkins@cassidycoates.com

**PROOF OF SERVICE OF
NOTICE OF APPEAL**

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J. D. Pitts-Johnson, a Deceased Minor, and
Rakeem Rashaud Johnson, father of
J.D. Pitts-Johnson, the Deceased Minor, Appellants,

vs.

Greenville City Police Department, Respondent.

PROOF OF SERVICE

I certify that our law office has served the Notice of Appeal on the counsels of record via email on Thursday, June 11, 2026, addressed to the legal counsel of record as follows:

Clark Price cprice@cassidycoates.com

Roni Payne rpayne@cassidycoates.com

Traci Larkins tlarkins@cassidycoates.com

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Respectfully submitted,

By: s/ *Lola Stradford Richey*

Lola Stradford Richey
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Attorney for the Appellant
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South Carolina Bar Number: 8931

Dated: Thursday, June 11, 2026

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**Richey and
Richey, P.A.
Attorneys at Law**

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Workers' Compensation
Personal Injury
Criminal Law

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: *Stephanie Levette Cason, et al vs. Greenville City Police
Department, et al*

Date of Loss: May 11, 2023

Civil Action Number: 2024CP2304676

Location of Accident: Greenville County

Dear Ms. Kitchings:

Enclosed for filing is an Amended Notice of Appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the Notice of Appeal on the Respondent;
- (2) Copies of the June 5, 2026, Orders from the Court of Common Pleas which is to be challenged on appeal;
- (3) Proof of service of hearing transcript request; and
- (4) A filing fee of \$250.

If you should have any questions, please do not hesitate to contact our law office.

With best wishes and warmest regards, I am

Truly yours,

Lola S. Richey

Lola S. Richey
Attorney at Law
Enclosures

Copy:

Other Counsels of Record:

V. Clark Price, Attorney

Roni Payne, Attorney

Cassidy Coates Price

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