

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

The Honorable Doyet A. Early, III

Appellate Case No. 2014-000642

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APR 04 2014

SC Court of Appeals

Julie Freeman Hair,

Plaintiff/Appellant-Respondent,

v.

J.L.H. Investments, LP, aka Hendrick Honda of Easley,

Defendant/Respondent-Appellant.

NOTICE OF APPEAL

Hendrick Honda of Easley ("Hendrick Honda") appeals the judgment and verdict in this matter dated September 19, 2013, and the subsequent order denying Hendrick Honda's timely post-trial motions filed March 17, 2014 (incorrectly certified by the Clerk of Court of Pickens County as April 17, 2014). Hendrick Honda received written notice of the denial of its post-trial motions on March 19, 2014. A copy of the judgment, verdict form, and order are attached to this notice as Exhibits A-B. Hendrick Honda moved for reconsideration of the order denying its post-trial motions on March 26, 2014 and received written notice of the entry of an order denying that motion on April 4, 2014. Order attached as Exhibit C.

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Appellate Case No. 2014-000642
C.A. No. 2012-CP-39-01554

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Julie Freeman Hair,

Plaintiff/Appellant-Respondent,

v.

J.L.H. Investments, LP, aka Hendrick Honda of Easley,

Defendant/Respondent-Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Appellant-Respondent, Julie Freeman Hair, by U.S. Mail, on April 4, 2014, addressed to the following counsel of record:

Brady Ryan Thomas, Esq.
Terry E. Richardson, Jr., Esq.
Richardson Patrick Westbrook & Brickman, LLC
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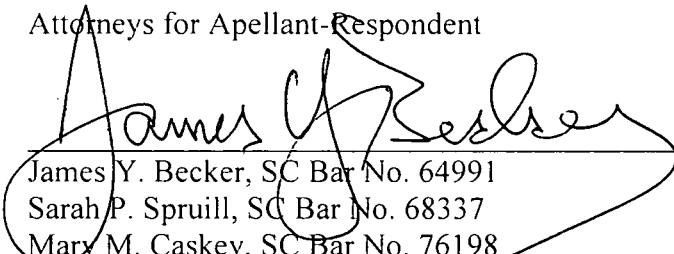
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April 4, 2014

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

APR 04 2014

SC Court of Appeals

RE: *Julie Freeman v. J.L.H. Investments, LP a/k/a Hendrick Honda of Easley*
Civil Action No. 2012-CP-39-01554
Appellate Case No. 2014-000642
HSB File No. 32239.0001

Dear Ms. Kitchings:

Enclosed for filing on behalf of the Respondent-Appellant is a notice of appeal, with attachments, in the above case. Also enclosed are the following:

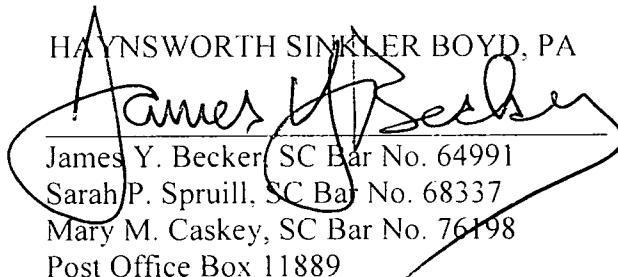
- (1) Proof of service of the notice of appeal on the Appellant-Respondent,
- (2) A filing fee of \$100, and
- (3) A copy of letter filing the notice of appeal with the lower court.

We have received the transcript, so please calendar our initial brief for 30 days from today.

Please return a clocked copy to me via my courier.

Very truly yours,

HAYNSWORTH SINKLER BOYD, PA


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The Honorable Jenny Abbott Kitchings

April 4, 2014

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In addition, Hendrick Honda appeals several interlocutory orders issued in this case.¹

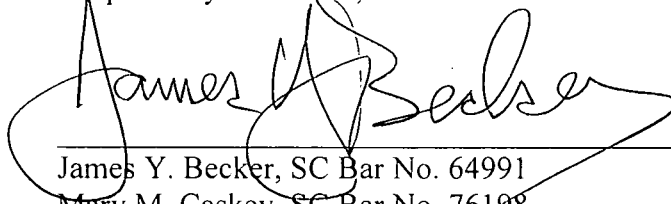
These orders are listed below:

1. Order Denying Defendants' Motion to Dismiss dated July 31, 2007 (attached as Exhibit D);
2. Order on Plaintiffs' Rule 41(A) Motion to Voluntarily Dismiss Certain Defendants and Defendants' Rule 59(E) Motion to Reconsider the Denial of Their Motions to Dismiss on Certain Grounds dated January 31, 2008 (attached as Exhibit E);
3. Order on Declaratory Judgment dated January 11, 2010 (attached as Exhibit F);
4. Order Regarding Julie Freeman's Motion for a Declaratory Judgment as to Defendant J.L.H. Investments, LP, d/b/a Hendrick Honda of Easley dated December 14 and 18, 2012² (attached as Exhibit G);
5. Order Regarding Plaintiff's Motion to Compel Discovery and Hendrick Honda of Easley's Second Amended Motion to Establish Procedural Requirements, Declare the Scope of the Plaintiff Group, and Require the Plaintiff to Give Notice to the Plaintiff Group dated March 20, 2013 (attached as Exhibit H);
6. Order Denying Defendant's Revised Motion for Judgment on the Pleadings dated September 5, 2013 (attached as Exhibit I);
7. Order on Defendant's Motion for Summary Judgment, Defendant's Motion in Limine, and Plaintiff's Motion to Deem Certain Paragraphs in Plaintiff's Third Amended Complaint Admitted filed September 16, 2013 (attached as Exhibit J);
8. Consent Order Granting Attorneys' Fees and Costs dated January 7, 2014 (attached as Exhibit K); and
9. Order Granting Plaintiff's Motion to Double the Damages Award in the Case dated March 13, 2014 (attached as Exhibit L).

¹ The Court will note that some of the attached orders bear a different caption. On August 31, 2012, this case was severed from another action styled *Heather Herron, et al., v. Dick Dyer & Associates, Inc., et al.* (Aiken County C.A. No.: 06 CP 02-1230) ("*Herron case*"). By court order dated November 29, 2012, the record in this case "for purposes of appeal or otherwise, [includes] all filings made by all parties in the *Herron case* before the date of this Supplemental Order."

² It appears the same order, but with different dates, was filed twice in this action. Hendrick Honda has attached both orders out of an abundance of caution.

Respectfully submitted,

A handwritten signature in black ink that reads "James Y. Becker". The signature is written in a cursive style and is positioned above a horizontal line.

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March 26, 2014

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