

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

72172

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas

Doyet A. Early, Circuit Court Judge

Case No. 2009-CP-19-0276



Cecelia Jackson, Personal Appellant
Representative of the Estate
of William Peterson


v.

Edgefield Medical Clinic, P.A., Respondent.

NOTICE OF APPEAL

Appellant Cecelia Jackson, Personal Representative of the Estate of William Peterson, appeals from a bench order of the Honorable Doyet A. Early on March 19, 2014, refusing to permit Appellant to seek damages for conscious pain and suffering. On March 27, 2014, Appellant filed a Motion for New Trial *Nisi* or *Additur*, New Trial under Thirteenth Juror Doctrine, or New Trial under SCRPC 59(a). Appellant's motion was denied in an order received on April 10, 2014.

Respectfully Submitted,



J. Stephen Welch
McGowan, Hood & Felder, LLC
P.O. Drawer 1778
1501 North Fant Street

RECEIVED

MAY 13 2014

SC Court of Appeals

Anderson, SC 29622-1778
(864) 225-6228
(864) 225-7928 (fax)
swelch@mcgowanhood.com

Jordan C. Calloway
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732
(803) 327-7800
(803) 328-5656 (fax)
jcalloway@mcgowanhood.com

Attorney for Appellant

Other attorneys of record:

James D. Nance
Nance, McCants & Massey
P.O. Box 2881
218 Newberry Street
Aiken, SC 29801
(803) 649-6200
(803) 649-2525 (fax)
jimnance@nancefirm.com

Attorney for Edgefield Medical
Clinic, P.A.

May 9, 2014
Rock Hill, SC

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM EDGEFIELD COUNTY
Court of Common Pleas

Doyet A. Early, Circuit Court Judge

Case No. 2009-CP-19-0276

Cecelia Jackson, Personal Appellant
Representative of the Estate
of William Peterson

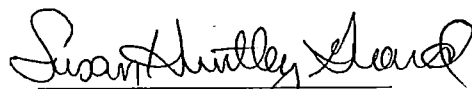
v.

Edgefield Medical Clinic, P.A. Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on this 9th day of May, 2014, she served counsel for the Defendant with a copy of the Notice of Appeal along with Certificate of Counsel in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

James D. Nance
Nance, McCants & Massey
PO Box 2881
218 Newberry Street
Aiken, SC 29801



Susan Huntley Guard
Paralegal to Jordan Caloway

RECEIVED

MAY 13 2014

SC Court of Appeals

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)
S. Randall Hood
John G. Felder, Jr.
W. Jones Andrews, Jr.
Jordan C. Calloway
Susan F. Campbell
Ashley White Creech
Ruskin C. Foster
Lara Pettiss Harrill



Whitney Harrison
Patrick M. Killen
William A. McKinnon (SC,DC)
Daniel "Ernie" Peagler
Robert V. Phillips
Seth Rose
James Stephen Welch* (SC,OK)
Joseph G. Wright, III*
Of Counsel*

Writer's Email: jcalloway@mcgowanhood.com

May 9, 2014

S.C. Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Cecelia Jackson, Personal Representative of the
Estate of William Peterson v. Edgefield Medical Clinic, P.A.
C.A. No. 09-CP-19-0276

Dear Sir or Madam:

I have enclosed original and two copies of a Notice of Appeal and Proof of Service for the above-referenced matter. Please file the original and return the copies in the enclosed envelope. I have also enclosed this firm's check in the amount of \$100.00 to cover the cost of this request.

By copy of this letter to defense counsel, James Nance, I am hereby serving him with the same.

Please feel free to call if you have any questions. Thank you.

Sincerely,

Jordan Calloway

JCC/shg
Enclosures
cc: James D. Nance, Esq.

RECEIVED

MAY 13 2014

SC Court of Appeals

1539 Health Care Drive, Rock Hill, SC 29732 · Tel: 803-327-7800 · Fax: 803-328-5656

Rock Hill · Columbia · Anderson · Sumter

www.mcgowanhood.com



McGOWAN, HOOD & FELDER, LLC
WWW.MCGOWANHOOD.COM
1501 North Fant Street
P. O. Drawer 1778
Anderson, SC 29622-1778



RECEIVED

MAY 13 2014

SC Court of Appeals

S.C. COURT OF APPEALS
PO Box 11629
COLUMBIA, SC 29211

2921181629 8012

