

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

72274

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2012-CP-22-00889

Alexander Mangialardo and Audra Mangialardo .....Appellants,

v.

Blue Ridge Ventures, LLC, Gerald W. Kelly, Elizabeth L. Kelly,  
South Carolina Bank & Trust, NA, Century 21 - The Beach Company, LLC,  
Caison Engineering Company, Inc., Keith Duncan,  
Attorneys Title Insurance Fund, Inc., G. Turner Perrow, Jr. and  
Tidelands Law, LLC .....Respondents.

NOTICE OF APPEAL

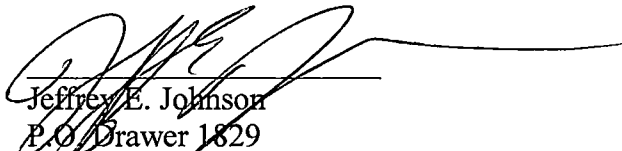
Alexander Mangialardo and Audra Mangialardo, appeals the Order Granting Motion of Gerald W. Kelly and Elizabeth L. Kelly for Summary Judgment of the Honorable Benjamin H. Culbertson dated September 9, 2013, Form 4 Judgment Denying Plaintiff's Motion to File Fourth Amended Complaint dated October 10, 2013, and Form 4 Judgment Denying Plaintiffs' Motion to Alter, Amend and/or Reconsider the Order Granting Defendants Kellys' Motion for Summary Judgment and Plaintiffs' Motion to Alter, Amend and/or Reconsider the Order Denying Plaintiffs' Motion to File a Fourth Amended Complaint of the Honorable Benjamin H. Culbertson dated April 30, 2014. Appellant received written notice of entry of this judgment on May 20, 2014 which has been filed with the Clerk of Court for Georgetown County South Carolina.

May 21, 2014

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MAY 23 2014

SC Court of Appeals



Jeffrey E. Johnson  
P.O. Drawer 1829  
Conway, SC 29528-1829  
Phone: (843) 488-5333  
S.C. Bar No. 16835

And

Karen A. Sauls  
Sauls Law Firm  
P.O. Drawer 2598  
Myrtle Beach SC 29578  
Phone: (843) 839-5030

Attorneys for Appellants

Other Counsel of Record:

Jack Scoville  
Post Office Drawer 1228  
Georgetown SC 29442  
(843) 546-1130  
843-546-0726  
Attorney for Respondent Kellys

Michael S. Chambers  
Michael S. Chambers, Attorney at Law  
121 Manly Street  
Greenville SC 29601  
(864) 242-9245  
864-242-2207  
Attorney for Respondent Attorneys  
Title Insurance Fund, Inc.

G. Turner Perrow  
Tidelands Law, LLC  
606 Front Street  
Georgetown SC 29440  
(843) 546-2900  
843-546-2202  
Attorney for Respondent G. Turner Perrow  
And Tidelands Law, LLC

Pro Se Respondents:

Keith Duncan as Registered Agent  
Blue Ridge Ventures, LLC  
647 Little Tony Avenue  
Murrells Inlet, SC 29576

Albert A. Caison as Registered Agent  
Caison Engineering Company, Inc.  
4034 Bayfield Loop  
Murrells Inlet, SC 29576-4806

Keith Duncan  
635 Little Tony Avenue  
Murrells Inlet, SC 29576

THE STATE OF SOUTH CAROLINA

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Case No. 2012-CP-22-00889

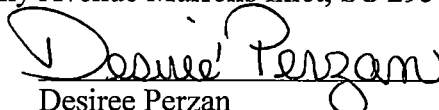
Alexander Mangialardo and Audra Mangialardo .....Appellants,

v.

Blue Ridge Ventures, LLC, Gerald W. Kelly, Elizabeth L. Kelly,  
South Carolina Bank & Trust, NA, Century 21 - The Beach Company, LLC,  
Caison Engineering Company, Inc., Keith Duncan,  
Attorneys Title Insurance Fund, Inc., G. Turner Perrow, Jr. and  
Tidelands Law, LLC .....Respondents.

**PROOF OF SERVICE**

I certify that I have served the Notice of Appeal on the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on May 21, 2014, addressed to Jack Scoville, P.O. Drawer 1228, Georgetown, SC 29442, Michael S. Chambers, 121 Manly Street, Greenville, SC 29601, and G. Turner Perrow 606 Front Street, Georgetown, SC 29440, Keith Duncan as Registered Agent for Blue Ridge Ventures, LLC, 647 Little Tony Avenue, Murrells Inlet, SC 29576, Albert A. Caison as Registered Agent for Caison Engineering Company, Inc., 4034 Bayfield Loop, Murrells Inlet, SC 29576-4806, and Keith Duncan at 635 Little Tony Avenue Murrells Inlet, SC 29576 on May 21, 2014.



Desiree Perzan  
Paralegal to Jeffrey E. Johnson  
P.O. Drawer 1829  
Conway, SC 29528  
(843) 488-5333

May 21, 2014

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**SC Court of Appeals**



**JEFFREY E. JOHNSON**

ATTORNEY AT LAW, LLC

1409 Second Avenue  
Conway, South Carolina 29526

Reply to: P.O. Drawer 1829  
Conway, SC 29528

S.C. Certified Civil Court Mediator

ADMITTED:

United States Supreme Court  
South Carolina Supreme Court  
United States Court of Appeals 4<sup>th</sup> Circuit  
United States District Court District of South Carolina

Tel: (843) 488-5333  
FAX: (843) 488-4290  
EMAIL: firm@jjohnsonlaw.net

May 21, 2014

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

The Honorable Alma Y. White  
Georgetown County Clerk of Court  
P.O. Box 479  
Georgetown, SC 29442

*RE:* Alexander Mangialardo and Audra Mangialardo v. Blue Ridge Ventures, LLC et. al.  
Case Number: 2012-CP-22-00889

Dear Ms. Kitchings and Ms. White:

Please find enclosed for filing in the above-referenced case the original and three (3) copies of the following:

1. Notice of Appeal (together with Order Granting Motion of Gerald W. Kelly and Elizabeth L. Kelly for Summary Judgment dated September 9, 2013, Form 4 Judgment Denying Plaintiffs' Motion to File Fourth Amended Complaint dated October 10, 2013, Form 4 Judgment Denying Plaintiffs' Motion to Alter, Amend and/or Reconsider the Order Granting Defendants Kellys' Motion for Summary Judgment and Plaintiffs' Motion to Alter, Amend and/or Reconsider the Order Denying Plaintiffs' Motion to File a Fourth Amended Complaint dated April 30, 2014.)
2. Proof of Service
3. \$100.00 check for payment of filing fee (as required by the SC Court of Appeals)

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MAY 23 2014

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Re: Mangialardo  
Page two

Please file the original with your office and return the clocked copies to me in the self addressed stamped envelope enclosed.

Please know South Carolina Bank & Trust, NA and Century 21 - The Beach Company, Inc. were previously dismissed from this matter and are no longer parties.

By copy of this correspondence I am hereby serving all counsel of record with same.

With kind regards, I am

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey E. Johnson', with a long horizontal flourish extending to the right.

Jeffrey E. Johnson

JEJ/dp  
Enclosures

cc: Jack Scoville, Esq.  
Michael S. Chambers, Esq.  
G. Turner Perrrow, Esq.  
Keith Duncan  
Blue Ridge Ventures, LLC  
Caison Engineering Company, Inc.  
Karen Sauls, Esq.  
Clients

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**SC Court of Appeals**



**Jeffrey E. Johnson  
Attorney at Law, LLC  
P.O. Drawer 1829  
Conway, SC 29528**

**The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211**