

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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SEP 04 2014

The Honorable Roger M. Young, Circuit Court Judge

SC Court of Appeals

Case No. 2013-CP-10-5579

JOSHUA FAY.....Appellant-Respondent,

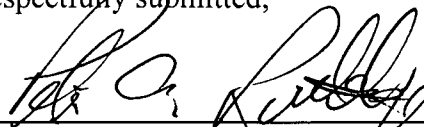
vs.

TOTAL QUALITY LOGISTICS, LLC.....Respondent-Appellant.

NOTICE OF CROSS APPEAL

Total Quality Logistics, LLC cross appeals the Order of the Honorable Roger M. Young dated April 14, 2014, granting partial summary judgment to Defendant Total Quality Logistics, LLC. Respondent received written notice of the Appellant's Appeal on August 25, 2014.

Respectfully submitted,



Robert D. Moseley, Jr. (SC ID: 05526)
Peter A. Rutledge (SC ID: 15899)
SMITH MOORE LEATHERWOOD LLP
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*Counsel for Respondent-Appellant Total Quality
Logistics, LLC*

September 2, 2014

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In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Roger M. Young, Circuit Court Judge

Case No. 2013-CP-10-5579

JOSHUA FAYAppellant-Respondent,

vs.

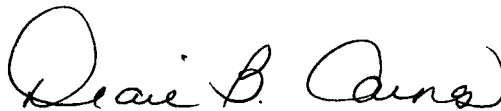
TOTAL QUALITY LOGISTICS, LLC.....Respondent-Appellant.

PROOF OF SERVICE

The undersigned employee of the law offices of Smith Moore Leatherwood LLP, attorneys for Respondent-Appellant, do hereby certify that service of the Notice of Cross Appeal was made on all counsel of record, specified below, by mailing a copy of the same by United States Mail, postage prepaid, to the following addresses:

Alice F. Paylor, Esq.
ROSEN ROSEN & HAGOOD, LLC
Post Office 893
Charleston, SC 29401
(843) 577-6726

Rene S. Dukes, Esq.
ROSEN ROSEN & HAGOOD, LLC
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Legal Assistant to Peter A. Rutledge

DATED: September 2, 2014

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SC Court of Appeals

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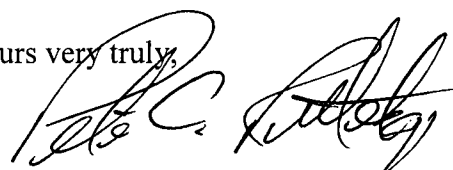
Ms. Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, S.C. 29211

Re: Joshua Fay vs. Total Quality Logistics, LLC
C.A. No. 2013-CP-10-5579
(Transferred to Business Court Pilot Program)

Dear Ms. Kitchings:

Enclosed please find an original and one copy of the Respondent-Appellant's Notice of Cross Appeal and Proof of Service in the above-referenced matter. I would ask that you file the original and return one filed copy to me in the envelope provided. I have also enclosed copies of Judge Young's Orders dated April 14, 2014 and August 4, 2014, together with our filing fee of \$100.00. Thank you.

Yours very truly,



Peter A. Rutledge
SMITH MOORE LEATHERWOOD LLP

PAR:dbc

Enclosures

cc: Alice F. Paylor, Esq. (w/enc.)
Rene S. Dukes, Esq. (w/enc.)

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SC Court of Appeals

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