

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM BEAUFORT COUNTY

OCT 31 2014

Marvin H. Dukes, III, Master-in-Equity

**SC Court of Appeals**

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Circuit Court Civil Action No: 2013-CP-07-2728

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In Re: Marilyn W. Bunn Irrevocable Trust under agreement dated April 9, 2001

Douglas S. Delaney and Thomas H. Bell..... Plaintiffs

v.

Ray Warco and Carolyn Myers .....Defendants

and

Denise Suddes, as Guardian for Marilyn W. Bunn, Margarent Mary  
Bunn Lochmandy, Kelly Kathleen Bunn, Regan Ann Lochmandy,  
Abigail Lochmandy, and The Unborn Issue Of Marilyn W. Bunn ..... Defendants

of which

Plaintiffs, Douglas S. Delaney and Thomas H. Bell are the ..... Appellants

Defendants, Denise Suddes, as Guardian for Marilyn W. Bunn, Margarent  
Mary Bunn Lochmandy, Kelly Kathleen Bunn, Regan Ann Lochmandy,  
Abigail Lochmandy, and The Unborn Issue Of Marilyn W. Bunn are the ..... Respondents

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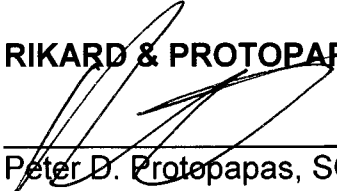
**NOTICE OF APPEAL**

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Plaintiffs, Douglas S. Delaney and Thomas H. Bell, appeal the Order Granting  
Bunn Defendants' Motion for Partial Summary Judgment of the Honorable Marvin H.  
Dukes, III, dated June 6, 2014, and the denial of the Motion for Reconsider, Alter, or  
Amend by Order of Judge Dukes dated October 3, 2014, and received by Appellant on  
October 13, 2014.

Respectfully submitted,

**RIKARD & PROTOPAPAS, LLC**



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*Attorneys for Appellants  
Douglas S. Delaney and Thomas H. Bell*

October 31, 2014  
Columbia, SC

**OTHER COUNSEL OF RECORD:**

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*Attorneys for Defendants/Respondents, Denise Suddes, as Guardian for Marilyn W. Bunn; Margaret Mary Bunn Lochmandy; Kelly Kathleen Bunn; Regan Ann Lochmandy; Abigail Lochmandy; and The Unborn Issue Of Marilyn W. Bunn collectively the "Bunn Defendants"*

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*Attorneys for Defendants Warco & Myers*

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of which

Plaintiffs, Douglas S. Delaney and Thomas H. Bell are the ..... Appellants

Defendants, Denise Suddes, as Guardian for Marilyn W. Bunn, Margarent  
Mary Bunn Lochmandy, Kelly Kathleen Bunn, Regan Ann Lochmandy,  
Abigail Lochmandy, and The Unborn Issue Of Marilyn W. Bunn are the ..... Respondents

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**PROOF OF SERVICE**

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I, Jo-Elaine Boyd, state that I am a paralegal for Rikard & Protopapas, L.L.C.,  
with offices at 1329 Blanding Street, Post Office Box 5640, Columbia, South Carolina;  
that on the 31st day of October, 2014, I delivered a copy of the following documents to  
the following parties:

**Documents:**

- ***Notice of Appeal***
- ***Order Granting Motion for Partial Summary Judgment***
- ***Order Denying Motion to Reconsider, Alter or Amend***

**Parties Served:**

**VIA U.S MAIL**

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**RECEIVED**

OCT 31 2014

**SC Court of Appeals**

October 31, 2014

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

IN RE: Marilyn W. Bunn Irrevocable Trust Under Agreement Dated April 9, 2001; Douglas S. Delaney and Thomas H. Bell, Plaintiffs; vs. Ray Warco and Carolyn Myers, Defendants; and Denise Suddes, as Guardian for Marilyn W. Bunn, Margaret Mary Bunn Lochmandy, Kelly Kathleen Bunn, Regan Ann Lochmandy, Abigail Lochmandy, and The Unborn Issue Of Marilyn W. Bunn  
Beaufort County Case No: 2013-CP-07-2728

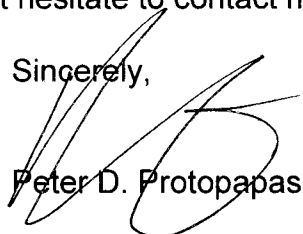
Dear Ms. Kitchings:

Enclosed please find Plaintiff's Notice of Appeal and Proof of Service along with copies of the Orders which are to be challenged on appeal. Please file the originals and return a clocked in copy to me in the self-addressed stamped envelope provided.

I have also enclosed my firm's check in the amount of \$100 representing the filing fee for the appeal.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Peter D. Protopapas

/jb  
Encls.

cc: Robert E. Sumner, IV, Esq.  
Kelly Jolley, Esq.  
Lin McDougall, Esq.