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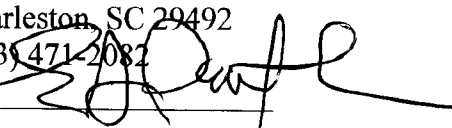
THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
CASE No. 2011- CP-10-1084  
Circuit Court Judge R. Markley Dennis, Jr.

ROOSEVELT SIMMONS )  
Plaintiff –Appellant )  
Vs. )  
MASE and COMPANY, LLC, )  
J. AL CANNON, JR., )  
CHARLESTON COUNTY )  
SHERIFF’S DEPARTMENT, )  
CHARLESTON COUNTY, )  
CHARLESTON COUNTY )  
REVENUE COLLECTIONS )  
DEPARTMENT and )  
HARRY LONG )  
Defendants-Respondents)

**RECEIVED**  
DEC 01 2014  
**SC Court of Appeals**  
**NOTICE OF APPEAL**

Plaintiff herein appeals the final Order filed June 21, 2013 by Circuit Court Judge R. Markley Dennis, Jr. granting summary judgment to all defendants and the Order filed October 13, 2014 by Circuit Court Judge R. Markley Dennis, Jr. denying plaintiff’s motion for reconsideration to alter or amend the final Order and the Form 4 Order filed November 20, 2012 by Circuit Court Judge R. Markley Dennis, Jr. denying summary judgment as to all defendants. Appellant received written notice of entry of the Order denying plaintiff’s motion for reconsideration on October 16, 2014.

Edward A. Bertele, Esq.  
Attorney for Appellant, Roosevelt Simmons  
1812 Pierce Street  
Charleston, SC 29492  
(843) 471-2082  
By: 

Dated: November 17, 2014

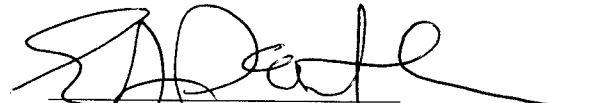
To: Counsel of Record

Christopher T. Dorsel, Esq.  
Senn Legal, LLC  
P.O. Box 12279  
Charleston, SC 29422  
(843) 556-4045  
Attorney for defendants except Mase and Company, LLC

Wendy R. Keefer, Esq.  
Keefer & Keefer, LLC  
1643B Savannah Highway, Suite 226  
Charleston, SC 29407  
(843) 860-1534  
Attorney for defendant Mase and Company, LLC

CERTIFICATION OF SERVICE

I hereby certify that a true copy of the within Notice of Appeal was served upon the defendants' attorneys by regular mail postage prepaid at their last known mailing address as set forth above.

  
Edward A. Bertele, Esq.

November 17, 2014  
Charleston, SC

**RECEIVED**  
DEC 01 2014  
SC Court of Appeals

**EDWARD A. BERTELE  
ATTORNEY AT LAW  
1812 PIERCE STREET  
CHARLESTON, SC 29492  
Email: [ebertele@msn.com](mailto:ebertele@msn.com)**

Member: SC, NJ & NY bars

Ph: (843) 471-2082  
Fax: (843) 471-2082

November 25, 2014

Ms. V. Claire Allen, Deputy Clerk  
Court of Appeals  
1015 Sumter St.  
PO Box 11629  
Columbia, SC 29211

**Re: Simmons v. Mase and Company et al.  
2011-CP-10-1084**

Dear Ms. Allen:

I am enclosing for filing the Notice of Appeal with original signature and Certification of Service on respondents with copies of the Order filed June 21, 2013 by Circuit Court Judge R. Markley Dennis, Jr. granting summary judgment to all defendants; Order filed October 13, 2014 by Circuit Court Judge R. Markley Dennis, Jr. denying plaintiff's motion for reconsideration to alter or amend the final Order; Form 4 Order filed November 20, 2012 by Circuit Court Judge R. Markley Dennis, Jr. denying summary judgment as to all defendants. Also enclosed is a copy of the letter dated November 25, 2014 to Deborah Garrison requesting transcripts.

Also enclosed is my check of \$100.00 for the filing fee. If you have any questions, please do not hesitate to call. Thank you for your kind assistance.

Very truly yours  
  
Edward A. Bertele

Encl:

CC: Christopher Dorsel, Esq.  
Wendy Keefer, Esq.  
Office of Court Administration  
Charleston County Clerk

**RECEIVED**

DEC 01 2014

**SC Court of Appeals**

**EDWARD A. BERTELE  
ATTORNEY AT LAW  
1812 PIERCE STREET  
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November 25, 2014

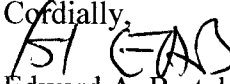
Ms. Deborah Garrison  
PO Box 901  
Johns Island, SC 29457

**Re: Simmons v. Mase and Company, et al.,  
2011-CP-10-1084**

Dear Ms. Garrison:

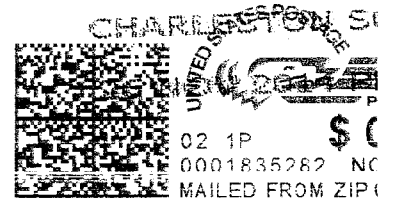
In connection with the filing of a Notice of Appeal in the captioned case, I would like to order transcripts for the following motion hearings before Judge R. Markley R. Dennis, Jr. : November 7, 2012 and March 20, 2013.

If you have any questions, please do not hesitate to call. Thank you for your kind assistance.

Cordially,  
  
Edward A. Bertele

CC: Office of Court Administration  
Court of Appeals  
Counsel of Record

Edward A. Bertele, Esq.  
1812 Pierce Street  
Charleston, SC 29492



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