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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM COLLETON COUNTY  
Court of Common Pleas

J. Ernest Kinard, Jr., Judge

Case No. 2013-CP-15-0411

**RECEIVED**

DEC 22 2014

**SC Court of Appeals**

Samuel Washington, Jr.,

Respondent,

v.

South Carolina Electric & Gas Company,

Appellant,

Emerson Electric Company d/b/a Emerson Network Power,  
and/or Emerson Network Power

Co-Defendant.

NOTICE OF APPEAL

Appellant South Carolina Electric and Gas Company appeals the Order of the Honorable J. Ernest Kinard, Jr., dated October 28, 2014. Appellant South Carolina Electric and Gas Company received an electronic copy of the Order on November 20, 2014.

December 19, 2014

John A. Massalon  
I. Ryan Neville  
WILLS MASSALON & ALLEN LLC  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144  
Attorneys for Appellant

Other Counsel of Record:

Margie Bright Matthews, Esquire  
Margie Bright Matthews, LLC  
Post Office Box 499  
Walterboro, SC 29488

And

S. Kirkpatrick Morgan, Jr., Esquire  
Charles T. Slaughter, Esquire  
Walker Morgan  
Post Office Box 949  
Lexington, South Carolina 29071

Attorneys for Respondent

H. Michael Bowers, Esquire  
Smith Moore Leatherwood LLP  
25 Calhoun Street, Suite 250  
Charleston, SC 29401

Attorney for Emerson Electric Company

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PROOF OF SERVICE

I certify that I served the Notice of Appeal on Respondent Samuel Washington, Jr. by depositing a copy of it in the United States Mail, postage prepaid, on December 19, 2014, addressed to his attorneys of record, Margie Bright Matthews, Post Office Box 499, Walterboro, SC 29488 and S. Kirkpatrick Morgan, Jr. and Charles T. Slaughter, Post Office Box 949, Lexington, SC 29071, and that the same was also served on Co-Defendant Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power by depositing a copy of it in the United States Mail, postage prepaid, on December 19, 2014, addressed to his attorneys of record, H. Michael Bowers, Esquire, Smith Moore Leatherwood LLP, 25 Calhoun Street, Suite 250, Charleston, SC 29401.

December 19, 2014

A handwritten signature in black ink, appearing to read "J. Massalon", written over a horizontal line.

John A. Massalon, Esq.  
I. Ryan Neville  
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97 Broad Street  
P.O. Box 859  
Charleston, SC 29402  
843-727-1144  
Attorneys for Appellant

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**WMA**

WILLS MASSALON & ALLEN LLC

**SC Court of Appeals**

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December 19, 2014

Direct Dial: (843) 793-6039

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

RE: Samuel Washington, Jr. v. South Carolina Electric and Gas Company, Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power  
Case No.: 2013-CP-15-411  
Our File No.: 1900-202

Dear Ms. Kitchings:

In regard to the above-referenced matter, enclosed for filing please find the following:

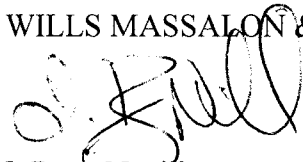
1. The original and one (1) copy of the Notice of Appeal;
2. The original and one (1) copy of the Proof of Service of the Notice of Appeal;
3. Two (2) copies of the order being challenged on appeal; and
4. Our firm's check #5737, dated December 19, 2014, in the amount of \$100.00 representing the filing fee.

Please file the originals, file-stamp the copies, returning a copy of each to me in the enclosed self-addressed, stamped envelope. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



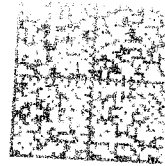
I. Ryan Neville  
[rneville@wmalawfirm.net](mailto:rneville@wmalawfirm.net)

Enclosures

cc: Margie Bright Matthews, Esquire  
S. Kirkpatrick Morgan, Jr., Esquire  
Charles T. Slaughter, Esquire  
H. Michael Bowers, Esquire  
Bryony Bowers Hodges, Esquire (via e-mail)  
Ms. Sandy Kammer (via e-mail)



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**SC Court of Appeals**

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

