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FORM 1
NOTICE OF APPEAL IN A CIVIL CASE

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

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JAN 02 2015

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Circuit Court Judge



Jack Powell,

Appellant,

v.

Carolina Center for
Occupational Health LLC.

Respondent.

NOTICE OF APPEAL

Appellant Pro se, Jack Powell enters this Appeal because of the mistakes made by Judge Dennis during the Motion for Summary Judgment that was granted on 11-5-14 to the Carolina Center for Occupational Health in the Charleston County Court of Common Pleas. Mistakes that were made and entered in the Appellant's Response to Motion for Summary Judgment. Also, for the mistakes made during the Plaintiff's Motion for Reconsideration that was denied on 12-1-14 and mistakes

made in the Order Granting Summary Judgment on 11-5-14.

1. During the Summary Judgment hearing, Judge Dennis made the mistake of stopping and not allowing the Plaintiff to enter the following;

A. The MUSC Doctor Instructions for "56" year old Plaintiff, Jack Powell.

That revealed the true medical condition of the patient and how susceptible he was to the anger of the CCOH male nurse after he read and ignored the report.

B. The Citing of law.

C. The video when the Plaintiff entered the jail in a wheelchair.

Reveals medical condition of patient being wheeled into the jail around 3:00 a.m. under the influence of drugs administered by the Emergency Room Doctor

2. Entered in the Order Granting Summary Judgment, Judge Dennis made the mistake of signing the Order because of the following;

A. The Defendant states; "Plaintiff admits that the Defendant's male nurse simply angrily told Plaintiff to get out of the wheelchair without any actual offer of physical violence.

Plaintiff did not admit to this statement.

3. Judge Dennis made the mistake of granting Summary Judgment when there was a preponderance of relevant evidence entered by the Plaintiff that

verified the following cited cases the Appellant Jack Powell tried to enter during the Motion for Summary Judgment hearing on 11-5-14; Brooker v.

Silverthorne (1919), Mellen v. Lane (2008), Herring v Lawrence Co. (1952), Jones by Robinson v. Winn Dixie Greenville Inc. (1995) and Papa v. Brunswick (1987).

Weapons

- A. **Knowledge**, of MUSC Dr. Instructions that nurse Thompson intentionally did not follow.
- B. **Power**, the apparent ability to take advantage of the circumstances.
- C. **Intimidation**, nurse Thompson said or did nothing when jailor injured his patient and continued to do so. Also ordered jailors around.
- D. **Authority**, to engage in an unsupervised angry conduct to threaten Mr. Powell.
- E. **Anger & Retaliation**, because of nurse Thompson's close ties with MUSC.

4. In the Plaintiff's Motion for Reconsideration, Judge Dennis made the mistake of Denying the Motion and the Plaintiff disputes the decision for the following reasons;

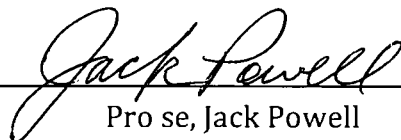
A. Wall, Templeton and Haldrup exercised an aggressive and angry manner towards the Plaintiff during their Deposition and also with attorney Jay Jones of Barnwell & Whaley who was present and was the attorney in the case involving Charleston County Detention Center where this same Appeal occurred on the morning of 6-22-12 and Mr. Jones was writing and sliding notes to the Defendant's attorney, to ask questions.

RULE 60 (b) (3)

B. On 7-30-14 Pro se was facing "15" Motions and Judge Dennis displayed contempt towards the Plaintiff and made an inflammatory personal attack by making an insulting statement about and to the Plaintiff in the courtroom which was; "I'm laughing at you too" that caused embarrassment, confusion and apprehension to attempt any furthering of his cases because of the fear of being scrutinized and the Appellant was shut down and not allowed to enter any evidence during two cases that day. Also, Appellant was shut down and not allowed to enter any evidence in two cases the same day as the Summary Judgment 11-5-14. Plaintiff Jack Powell had made a complaint in his Reconsideration concerning Judge Dennis's contempt towards the Pro se.

Appellant Pro se, Jack Powell requests the Honorable South Carolina Court of Appeals to Reverse the Decision made by Judge Dennis of the Court of Common Pleas, 9th District for his mistakes rendered because of contempt for Jack Powell.

Dated and Signed on 12-30-14


Pro se, Jack Powell

Attorney's of Record
Wall, Templeton and Haldrup
145 King St. Ste. 300
Charleston, S.C. 29412
(843) 329-9500

Mailing Address
Appellant, Pro se, Jack Powell
1402 Camp Rd. Unit 8-A
Charleston, S.C. 29412
(843) 952-4762

Defendant
Carolina Center for Occupational Health
4600 Goer Dr. Ste. 205
North Charleston, S.C. 29406
(843) 554-1029

SOUTH CAROLINA COURT OF APPEALS
EXHIBIT LIST/CASE 2013-CP-10-6567

PLAINTIFF'S MOTION FOR CONSIDERATION LIST

1. "K" P. 11
2. "L" P. 12

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PLAINTIFF'S RESPONSE TO MOTION FOR SUMMARY JUDGMENT LIST

1. "A"
2. "B"
3. "C"
4. "D"
5. "F"
6. "G"

**NOTICE OF SERVICE/HAND DELIVERED
"NOTICE" OF APPEAL TO THE SOUTH CAROLINA COURT OF APPEALS**

Pro se, Jack Powell is giving notice to the Carolina Center for Occupational Health LLC. that he is appealing C/A NO. 2013-CP-10-6567. Notice was submitted to the Charleston County Clerks Office and will also be submitted to the South Carolina Court of Appeals on or before December 31, 2014.

This a hand delivered Notice and is to be properly signed at delivery by the Carolina Center for Occupational Health located at;

4600 Goer Dr. Ste. 205
North Charleston, S.C. 29406

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SC Court of Appeals

Delivered and Signed on 12-22-14, by;

A handwritten signature in black ink, appearing to read "J. J. Jager", written over a horizontal line. The signature is cursive and somewhat stylized.

NOTICE OF SERVICE/HAND DELIVERED
"NOTICE" OF APPEAL TO THE SOUTH CAROLINA COURT OF APPEALS

Pro se, Jack Powell is giving notice to the Attorney's for the Carolina Center for Occupational Health LLC. that he is appealing C/A 2013-CP-10-6567. Notice was submitted to the Charleston County Clerks Office and will also be submitted to the South Carolina Court of Appeals on or before December 31, 2014.

This is a hand delivered Notice and is to be properly signed at delivery by Wall, Templeton & Haldrup located at;

Wall, Templeton & Haldrup
 145 King St. Ste. 300
 Charleston, S.C. 29402

RECEIVED
 JAN 02 2015
SC Court of Appeals

Delivered & Signed on 12-30-14, by _____
 Wall, Templeton & Haldrup, Representative

Appellant called Attorney's office on 12-30-14 and left a message for Brown Mcloud about Service and an attempt was made at 3:50 p.m. and apparently the office was closed for the Holidays. Jack Powell mailed the Notice of Appeal to them by Certified Mail on 12-30-14.

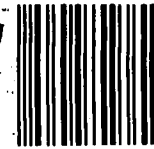
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Jack Powell



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