

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

74937

Honorable Robert E. Hood, Circuit Court Judge

Case No. 2014-CP-40-00271

Kerry Paul,

Appellant,

v.

South Carolina Department of Employment and  
Workforce,

Respondent.

NOTICE OF APPEAL

Nancy Bloodgood, Esq., SC Bar No. 6459  
Lucy C. Sanders, Esq., SC Bar No. 78169  
**FOSTER LAW FIRM, L.L.C.**  
895 Island Park Drive, Suite 202  
Charleston, SC 29492  
Telephone: (843) 972-0313  
Facsimile: (888) 519-0934  
Email: [nbloodgood@fosterfoster.com](mailto:nbloodgood@fosterfoster.com)  
[lsanders@fosterfoster.com](mailto:lsanders@fosterfoster.com)  
*Attorneys for the Appellant*

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SC Court of Appeals

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

Kerry Paul hereby appeals the Order of the Honorable Robert E. Hood, attached hereto as Exhibit A, dated January 6, 2015 and filed with the Richland County Clerk of Court on January 7, 2015.

Respectfully Submitted,



Nancy Bloodgood, Esq., SC Bar No. 6459

Lucy C. Sanders, Esq., SC Bar No. 78169

**FOSTER LAW FIRM, L.L.C.**

895 Island Park Drive, Suite 202

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[lsanders@fosterfoster.com](mailto:lsanders@fosterfoster.com)

*Attorneys for the Respondent*

Charleston, South Carolina

Date: 2/2/15

**Other Counsel of Record:**

Christi P. Cox, Esquire

Hamilton Martens Ballou & Carroll

PO Box 10940

Rock Hill, SC 29731

803-329-7672

[Christi.cox@hamiltonmartens.com](mailto:Christi.cox@hamiltonmartens.com)

*Attorneys for the Respondent*

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Honorable Robert E. Hood, Circuit Court Judge

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Case No. 2014-CP-40-00271

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Kerry Paul,

Appellant,

v.

South Carolina Department of Employment and  
Workforce,

Respondent.

**PROOF OF SERVICE FOR THE NOTICE OF APPEAL**

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Nancy Bloodgood, Esq., SC Bar No. 6459  
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[lsanders@fosterfoster.com](mailto:lsanders@fosterfoster.com)  
*Attorneys for the Appellant*

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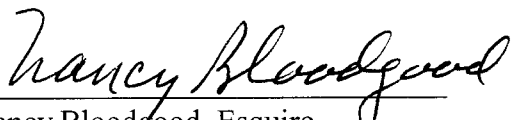
SC Court of Appeals

I hereby certify that on February 2, 2015 I served a copy of the Notice of Appeal to the following:

Christi P. Cox, Esquire  
Hamilton Martens Ballou & Carroll  
PO Box 10940  
Rock Hill, SC 29731  
*Attorneys for the Respondent*

Richland County Clerk of Court  
Richland County Judicial Center  
PO Box 2766  
Columbia, SC 29202

by placing a copy of said documents in the United States mail with sufficient postage thereon.

  
Nancy Bloodgood, Esquire

Charleston, South Carolina

Date: 2/2/15



**FOSTER LAW FIRM, L.L.C.**

*Attorneys and Counselors at Law*

NANCY BLOODGOOD  
nbloodgood@fosterfoster.com  
REPLY TO CHARLESTON

PAUL J. FOSTER, JR., 1928-1999

February 2, 2015

Richland County Clerk of Court  
Richland County Judicial Center  
PO Box 2766  
Columbia, SC 29202

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SC Court of Appeals

RE: *Kerry Paul v. South Carolina Department of Employment and Workforce*  
Case No.: 2014-CP-40-271  
Our File No.: 11463

Dear Sir/Madam,

Enclosed please find for filing an original and one copy of the Notice of Appeal and Proof of Service in connection with the above-referenced matter. I would appreciate you filing the original and returning a clocked-in copy of the same to me in the enclosed self-addressed stamped envelope.

By copy of this letter to opposing counsel, I am serving a copy of the same.

Thank you for your assistance in this matter.

Sincerely,



Nancy Bloodgood

NB/alk  
Enclosures

cc: Kerry Paul  
Christi P. Cox, Esquire  
Clerk of Court, SC Court of Appeals

[www.fosterfoster.com](http://www.fosterfoster.com)

GREENVILLE: 601 E. McBee Avenue, Suite 104 • Greenville, SC 29601 • 864-242-6200 • Fax: 864-233-0290  
CHARLESTON: 895 Island Park Drive, Suite 202 • Charleston, SC 29492 • 843-972-0313 • Fax: 888-519-0934

Toll Free: 866-279-9772



**FOSTER LAW FIRM, L.L.C.**

*Attorneys and Counselors at Law*

PAUL J. FOSTER, JR., 1928-1999

NANCY BLOODGOOD  
nbloodgood@fosterlaw.com  
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February 2, 2015

**SC Court of Appeals**

Karen E. Ambroziak  
1083 Langford Road  
Blythewood, SC 29016

RE: *Kerry Paul v. South Carolina Department of Employment and Workforce*  
Case No.: 2014-CP-40-271  
Our File No.: 11463

Dear Ms. Ambroziak,

On September 8, 2014, the above case was heard before the Honorable Robert E. Hood, Circuit Court Judge, in Richland County. My records indicate that you were the court reporter for this case.

It is my understanding that opposing counsel in this case has previously requested a transcript of the proceedings. I would appreciate a copy of the same. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely,



Nancy Bloodgood

NB/alk

cc: Kerry Paul  
Christi P. Cox, Esquire  
Clerk of Court, SC Court of Appeals  
S.C. Court Administration

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**FOSTER LAW FIRM, L.L.C.**

*Attorneys and Counselors at Law*

PAUL J. FOSTER, JR., 1928-1999

NANCY BLOODGOOD  
nbloodgood@fosterfoster.com  
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**SC Court of Appeals**

February 2, 2015

L. Coconut Pantsari  
309 Willow Winds Drive  
Columbia, SC 29210-4459

RE: *Kerry Paul v. South Carolina Department of Employment and Workforce*  
Case No.: 2014-CP-40-271  
Our File No.: 11463

Dear Ms. Pantsari,

On July 23, 2014, the above case was heard before the Honorable Robert E. Hood, Circuit Court Judge, in Richland County. My records indicate that you were the court reporter for this case.

It is my understanding that opposing counsel in this case has previously requested a transcript of the proceedings. I would appreciate a copy of the same. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely,



Nancy Bloodgood

NB/alk

cc: Kerry Paul  
Christi P. Cox, Esquire  
Clerk of Court, SC Court of Appeals  
S.C. Court Administration

[www.fosterfoster.com](http://www.fosterfoster.com)

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**FOSTER LAW FIRM, L.L.C.**

*Attorneys and Counselors at Law*

PAUL J. FOSTER, JR., 1928-1999

NANCY BLOODGOOD  
nbloodgood@fosterfoster.com  
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SC Court of Appeals

February 2, 2015

Crystal M. Holmes  
PO Box 611  
Columbia, SC 29202

RE: *Kerry Paul v. South Carolina Department of Employment and Workforce*  
Case No.: 2014-CP-40-271  
Our File No.: 11463

Dear Ms. Holmes,

On November 25, 2014, the above case was heard before the Honorable Robert E. Hood, Circuit Court Judge, in Richland County. My records indicate that you were the court reporter for this case.

I request that you provide me with a transcript of the proceedings. Please transcribe the entire record. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely,



Nancy Bloodgood

NB/alk

cc: Kerry Paul  
Christi P. Cox, Esquire  
Clerk of Court, SC Court of Appeals  
S.C. Court Administration

[www.fosterfoster.com](http://www.fosterfoster.com)

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Toll Free: 866-279-9772



**FOSTER LAW FIRM, L.L.C.**

*Attorneys and Counselors at Law*

NANCY BLOODGOOD  
nbloodgood@fosterfoster.com  
REPLY TO CHARLESTON

PAUL J. FOSTER, JR., 628-6899

February 2, 2015

The Honorable Jenny Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: *Kerry Paul v. South Carolina Department of Employment and Workforce*  
Case No.: 2014-CP-40-271  
Our File No.: 11463

Dear Ms. Kitchings,

Enclosed please find for filing an original and one copy of the Notice of Appeal, Proof of Service, a copy of the Order which is to be challenged on appeal, and our firm's check in the amount of \$100.00 representing the filing fee in connection with the above-referenced matter. I would appreciate you filing the original and returning a clocked-in copy of the same to me in the enclosed self-addressed stamped envelope.

By copy of this letter to opposing counsel, I am serving a copy of the same.

Thank you for your assistance in this matter.

With kindest regards, I am

Sincerely,



Nancy Bloodgood

NB/alk

Enclosures

cc: Kerry Paul  
Christi P. Cox, Esquire  
Richland County Clerk of Court

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**SC Court of Appeals**

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Toll Free: 866-279-9772

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SC Court of Appeals

**First Class Mail**

The Honorable Jenny Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

