

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

175318

Clifton Newman, Circuit Court Judge

Case No. 2011-CP-23-5300

Jack R. Harrell, Jr. and Tina W. Harrell Appellant,


v.

Keowee Falls Investment Group, LLC, The Cliffs
Communities, LLC and S&ME, Inc.

Of whom Keowee Falls Investment Group is the Respondent.

NOTICE OF APPEAL

Jack R. Harrel, Jr. and Tina W. Harrell appeal the order of the Honorable Clifton Newman dated February 10, 2015. Appellants received written notice of entry of this order on February 16, 2015.


T. S. Stern, Jr. (SC Bar ID 5357)
V. Elizabeth Wright (SC Bar ID 76029)
COVINGTON, PATRICK, HAGINS,
STERN & LEWIS, LLC
211 Pettigru Street
Greenville, SC 29601
(864) 242-9000
Attorneys for the Appellants

Greenville, South Carolina
March 10, 2015

RECEIVED
MAR 12 2015
SC Court of Appeals

Other counsel of record:

Elizabeth M. McMillan, Esq.
McAngus Goudelock & Courie, LLC
P.O. Box 2980 (29602)
Two Liberty Square
75 Beattie Place, Suite 300
Greenville, SC 29601
(864) 239-4037
Beth.mcmillan@mgclaw.com

*Attorneys for Respondent Keowee Falls
Investment Group and The Cliffs Communities, LLC*

Stephanie H. Burton, Esq.
Gibbes Burton, LLC
308 East Saint John Street
Spartanburg, SC 29302
(864) 327-5000
sburton@gibbesburton.com

Attorneys for S&ME, Inc.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2011-CP-23-5300

RECEIVED
MAR 12 2015
SC Court of Appeals

Jack R. Harrell, Jr. and Tina W. Harrell Appellant,

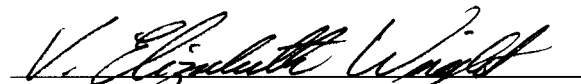
v.

Keowee Falls Investment Group, LLC, The Cliffs
Communities, LLC and S&ME, Inc.

Of whom Keowee Falls Investment Group is the Respondent.

PROOF OF SERVICE

I certify that I have served the **NOTICE OF APPEAL** on counsel for the Respondent and for The Cliffs Communities, LLC Elizabeth M. McMillan, at her address of P.O. Box 2980, Greenville, SC 29602 and counsel for S&ME, Inc. at her address of 308 East Saint John Street, Spartanburg, SC 29302, by depositing it into the U.S. Mail, first class postage prepaid on March 10, 2015.


T. S. Stern, Jr. (SC Bar ID 5337)
V. Elizabeth Wright (SC Bar ID 76029)
COVINGTON, PATRICK, HAGINS,
STERN & LEWIS, LLC
211 Pettigru Street
Greenville, SC 29601
(864) 242-9000
Attorneys for the Appellants

Greenville, South Carolina
March 10, 2015

COVINGTON, PATRICK, HAGINS, STERN & LEWIS, LLC

An Association of Independent Attorney Professional Associations

T. S. Stern, Jr.
Direct Dial: (864) 240-5516
Direct Fax: (864) 240-5545
E-Mail: sstern@covpatlaw.com

864.242.9000
864.233.9777 Fax
1.800.849.2988

V. Elizabeth Wright
Associate
Direct Dial: (864) 240-5519
E-Mail: bwright@covpatlaw.com

March 10, 2015

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Jack r. Harrell, Jr. and Tina W. Harrel v. Keowee Falls Investment Group, LLC, The Cliffs Communities, LLC and S&ME, Inc. *of whom* Keowee Falls Investment Group in the Appellant.
Case No. 2011-CP-23-5300

Dear Ms. Kitchings:

Enclosed for filing is a notice of appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondent.
- (2) A copy of the order which is to be challenged on appeal; and
- (3) A filing fee of \$100.

Please file the originals and return a clocked-in coy of each to me. By copy of this letter, I am serving a copy of the foregoing upon counsel of records.

Very truly yours,

COVINGTON, PATRICK, HAGINS,
STERN & LEWIS, LLC


V. Elizabeth Wright

VEW/kmb
Enclosure(s)

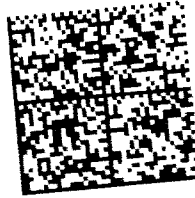
cc: Elizabeth M. McMillan, Esq.
McAngus Goudelock & Courie, LLC
P.O. Box 2980
Greenville, SC 29602

Attorneys for Respondent Keowee
Falls Investment Group and The
Cliffs Communities, LLC

Stephanie H. Burton, Esq.
Gibbes Burton, LLC
308 East Saint John Street
Spartanburg, SC 29302

Attorneys for S&ME, Inc.

RECEIVED
MAR 12 2015
SC Court of Appeals



US POSTAGE
\$ 02.45
First-Class

Mailed From 29601
03/10/2015
032A 0061802672

Dovington, Patrick, Hagins, Stern & Lewis, LLC
Attorneys at Law
Post Office Box 2343
Greenville, South Carolina 29602

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
MAR 12 2015
SC Court of Appeals

