

75675

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

James Verner, Esquire – Special Referee

Case Number: 2013-CP-36-00645

RECEIVED

APR 14 2015

SC Court of Appeals

St. Paul Independent Church Pomaria, Inc. .... Appellant,

v.

African Methodist Episcopal Church, Inc., St. Paul A.M.E. Church, Inc., Elder Joseph Postell (in his capacity as an Elder for the A.M.E. Church, Inc., ..... Respondents,

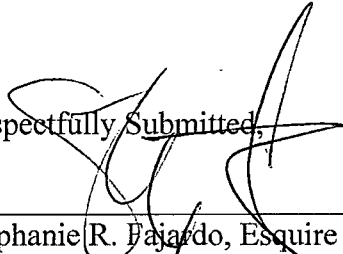
v.

Shirley Wise, Lisa Houseal, and Thomas Flemon, in their capacities as former Trustees of St. Paul A.M.E. Church Pomaria, Inc., ..... Third Party Appellants.

**NOTICE OF APPEAL**

PLEASE TAKE NOTICE that the above referenced Appellant and Third Party Appellants hereby appeal the grant of summary judgment to Respondents entered by Order of James S. Verner, Esquire, Special Referee signed March 30, 2015 and filed April 7, 2015. Trial Counsel's address was incorrect on the filed Order and therefore trial counsel received a copy of this Order Granting Defendant St. Paul A.M.E. Church's Motion for Summary Judgment on April 13, 2015 through Appellant.

Respectfully Submitted,



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Stephanie R. Fajardo, Esquire  
The Fajardo Law Firm, LLC  
Post Office Box 2177  
Irmo, South Carolina 29063  
Phone: (803) 391-8980  
Facsimile: (877) 365-5340  
Trial Counsel for Appellant and  
Third Party Appellants

April 13, 2015

Charles J. Boykin, Esquire  
Post Office Box 11844  
Columbia, South Carolina 29211  
Trial Counsel for the Respondents  
Phone: (803) 254-0707

THE STATE OF SOUTH CAROLINA

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James Verner, Esquire – Special Referee

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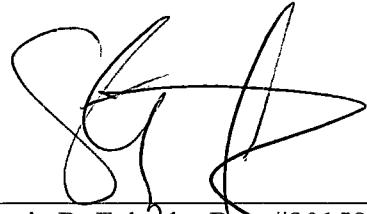
v.

Shirley Wise, Lisa Houseal, and Thomas Flemon, in their capacities as former Trustees of St. Paul A.M.E. Church Pomaria, Inc..... Third Party Appellants.

**PROOF OF SERVICE**

I certify that I have served the **Notice of Appeal** in the above matter on opposing counsel of record, by depositing a copy of the same in the United States Mail, postage prepaid, on April 13, 2015, addressed as follows:

Charles J. Boykin, Esquire  
Post Office Box 11844  
Columbia, South Carolina 29211



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Stephanie R. Fajardo, Bar #80159  
The Fajardo Law Firm, LLC  
Attorney for Appellant and Third-Party  
Appellants

FILE

THE FAJARDO LAW FIRM, LLC

April 13, 2015

RECEIVED

APR 14 2015

SC Court of Appeals

Newberry County Clerk of Court  
Post Office Box 278  
Newberry, South Carolina 29108

Re: St. Paul Independent Church Pomaria, Inc. vs. African Methodist Episcopal Church, Inc., St. Paul A.M.E. Church Pomaria, Inc., Elder Joseph Postell (in his capacity as an Elder of the A.M.E. Church, Inc.) vs. Shirley Wise, Lisa Houseal, and Thomas Flemon, in their capacities as former Trustees of St. Paul A.M.E. Church Pomaria, Inc.  
Civil Action No.: 2013-CP-36-00645

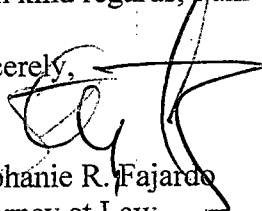
Dear Clerk of Court:

I hope this letter finds you well. Enclosed please find the original and one (1) copy of the **Plaintiff and Third Party Defendants' Notice of Appeal** in the above matter. I would appreciate you filing the original and returning the clocked copies to my office in the envelope I have provided for your convenience.

If you should have any questions or concerns, please do not hesitate to contact me.

With kind regards, Sam

Sincerely,

  
Stephanie R. Fajardo  
Attorney at Law

Enclosures – listed in text

Stephanie R. Fajardo, Esquire  
7588 Woodrow Street, Suite 5  
Post Office Box 2177  
Irmo, South Carolina 29063

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stephanie@fajardolawfirm.com  
www.fajardolawfirm.com



# THE FAJARDO LAW FIRM, LLC

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APR 14 2015

SC Court of Appeals

April 13, 2015

South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: St. Paul Independent Church Pomaria, Inc. vs. African Methodist Episcopal Church, Inc., St. Paul A.M.E. Church Pomaria, Inc., Elder Joseph Postell (in his capacity as an Elder of the A.M.E. Church, Inc.) vs. Shirley Wise, Lisa Houseal, and Thomas Flemon, in their capacities as former Trustees of St. Paul A.M.E. Church Pomaria, Inc.  
Civil Action No.: 2013-CP-36-00645

St. Paul Independent Church Pomaria, Inc., Appellant v. African Methodist Episcopal Church, Inc., St. Paul A.M.E. Church Pomaria, Inc., Elder Joseph Postell (in his capacity as an Elder of the A.M.E. Church, Inc.), Respondents v. Shirley Wise, Lisa Houseal, and Thomas Flemon, in their capacities as former Trustees of St. Paul A.M.E. Church Pomaria, Inc., Third-Party Appellants

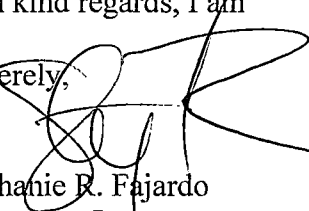
Dear Clerk:

I hope this letter finds you well. Enclosed please find the original and one (1) copy of the **Appellant and Third-Party Appellant's Notice of Appeal** with a copy of the Order being appealed attached and **Proof of Service** in the above matter. I would appreciate you filing the original and returning the clocked copies to my office in the envelope I have provided for your convenience. I have enclosed a check in the amount of \$100.00 to cover the applicable filing fee for this action.

If you should have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

  
Stephanie R. Fajardo  
Attorney at Law

Enclosures – listed in text

Stephanie R. Fajardo, Esquire  
7588 Woodrow Street, Suite 5  
Post Office Box 2177  
Irmo, South Carolina 29063

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www.fajardolawfirm.com

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South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629

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