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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 07 2015

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

74706

Case No. 2012-CP-24-00574

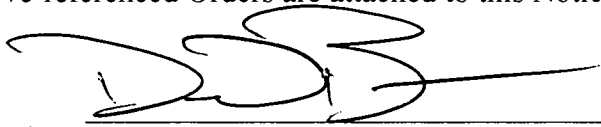
Miller Construction Company, LLC.....Respondent,

v.

PC Construction Company of Greenwood, Inc. and Safeco Insurance Company
of America.....Appellants.

NOTICE OF CROSS-APPEAL

Miller Construction Company, LLC cross-appeals the Order of The Honorable Eugene C. Griffith, Jr., dated July 1, 2014 and filed on July 8, 2014. Respondents received written notice of entry of this Order on July 18, 2014; and, on July 21, 2014, Respondents filed a Motion pursuant to Rule 59, SCRCF. Respondents also appeal the Order denying their Rule 59 Motion, dated November 18, 2014 and filed on November 26, 2014. Respondents received written notice of entry of the Order denying their Rule 59 Motion on December 8, 2014. Respondents received service of Appellant's Notice of Appeal on January 2, 2015. The above-referenced Orders are attached to this Notice.



January 6, 2014.

David J. Brousseau
McIntosh, Sherard, Sullivan & Brousseau
Post Office Box 197
Anderson, South Carolina 29622-0197
(864) 225-0001 (864) 225-0004 (fax)
Attorney for Respondent

Other Counsel of Record:

Edward Wade Mullins III, Esquire
Bruner, Powell, Robbins, Wall & Mullins, LLC
Post Office Box 61110
Columbia, South Carolina 29260
Attorney for Appellants

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of America.....Appellants.

PROOF OF SERVICE

I certify that I have served the Notice of Cross-Appeal on PC Construction Company of Greenwood, Inc. and Safeco Insurance Company of America by depositing a copy of it in FedEx Overnight, on January 6, 2015, addressed to their attorney of record, Edward Wade Mullins III, Esquire, at his office at 1735 Saint Julian Place #200, Columbia, SC 29204. I also certify that I served the Notice of Cross-Appeal on The Honorable Angela M. Woodhurst, Greenwood County Clerk of Court, by depositing a copy of the same in FedEx Overnight, on January 6, 2015, at her office at 528 Monument Street, Room 114, Greenwood, South Carolina 29646-2634.

January 6, 2015.



David J. Brousseau
McIntosh, Sherard, Sullivan & Brousseau
Post Office Box 197
Anderson, South Carolina 29622-0197
(864) 225-0001 (864) 225-0004 (fax)
Attorney for Respondent

MCINTOSH, SHERARD, SULLIVAN & BROUSSEAU

ATTORNEYS AT LAW
138 NORTH MAIN STREET
PO BOX 197
ANDERSON, SC 29622-0197

TELEPHONE
(864) 225-0001
FAX (864) 225-0004

WALTER H. HOOD (1908-1971)
MARSHALL P. SHERARD (1910-1970)
JACK F. McINTOSH - Retired
MARSHALL P. SHERARD, JR. - Partner
GEORGE P. SULLIVAN - Partner
DAVID J. BROUSSEAU - Partner
S. LESLIE McINTOSH - Associate

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SC Court of Appeals

The Honorable Angela M. Woodhurst
Clerk of Court for Greenwood County
528 Monument Street Room 114
Greenwood, South Carolina 29646

Re: *Miller Construction Company, LLC v PC Construction of Greenwood, Inc. and Safeco Insurance Company of America*, Case No.: 2012-CP-24-574

Dear Ms. Woodhurst:

Enclosed for filing is two (2) copies of a notice of appeal in the above-referenced case. I have enclosed a stamped return envelope for your convenience in sending us a filed copy of the same.

With kindest regards; I remain,

Truly yours,


S. Leslie McIntosh

/SLM

Enclosures

MCINTOSH, SHERARD, SULLIVAN & BROUSSEAU

ATTORNEYS AT LAW
138 NORTH MAIN STREET
PO BOX 197
ANDERSON, SC 29622-0197

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SC Court of Appeals

January 6, 2015

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

Re: *Miller Construction Company, LLC v. PC Construction of Greenwood, Inc. and Safeco Insurance Company of America*, Case No.: 2012-CP-24-00574

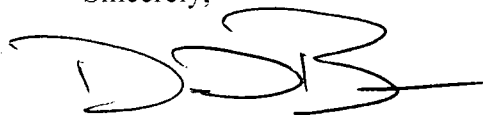
Dear Ms. Kitchings:

Enclosed for filing is a Notice of Cross-Appeal in the above case. Also enclosed are the following:

- (1) An original and two (2) copies of Respondent's Proof of Service of the Notice of Cross-Appeal on the Appellants and the Greenwood County Clerk of Court.
- (2) A copy of the orders which are to be challenged on appeal.
- (3) A filing fee of \$100.00.
- (4) A stamped return envelope for your convenience in returning the filed copies.

With kindest regards; I remain,

Sincerely,



David J. Brousseau
McIntosh, Sherard, Sullivan & Brousseau
Post Office Box 197
Anderson, South Carolina 29622
(864) 225-0001
Attorney for Respondent

DJB/SLM

Enclosures

cc: E. Wade Mullins III, Esquire (via FedEx Overnight)
The Honorable Angela M. Woodhurst, Greenwood County Clerk of Court (via FedEx Overnight)