

**RECEIVED**

JUN 11 2015  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 10 2015  
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Common Pleas Court

William P. Keesley, Circuit Court Judge

Appellate Case No. 2015-001153  
Civil Action No. 2012-CP-32-0342

Leon Lott, the Duly Elected Sheriff of  
Richland County, South Carolina.....Respondent-Appellant,

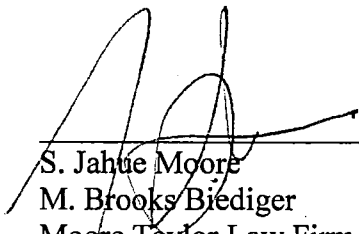
v.

Kay F. Paschal.....Appellant-Respondent.

**NOTICE OF CROSS APPEAL**

Kay F. Paschal hereby cross appeals the Orders of the Honorable William P. Keesley dated December 9, 2014, and April 27, 2015. Counsel for Ms. Paschal has not received a Notice of Appeal in this matter.

June 10, 2015.

  
\_\_\_\_\_  
S. Jahue Moore  
M. Brooks Biediger  
Moore Taylor Law Firm, P.A.  
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Attorneys for Kay F. Paschal

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Andrew F. Lindemann, Esquire  
Davidson & Lindemann, P.A.  
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Columbia, SC 29202  
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Attorneys for Leon Lott

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Leon Lott, the Duly Elected Sheriff of  
Richland County, South Carolina..... Respondent-  
Appellant,

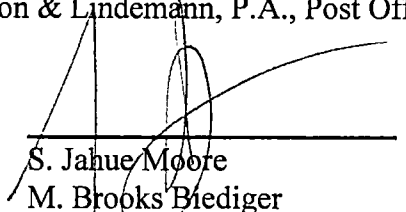
v.

Kay F. Paschal..... Appellant-Respondent.

PROOF OF SERVICE

I certify that I have served the Notice of Cross Appeal on Leon Lott, by depositing a copy of it in the United States Mail, postage prepaid, on June 10, 2015, addressed to their attorneys of record, Andrew F. Lindemann, Esquire, of Davidson & Lindemann, P.A., Post Office Box 8568, Columbia, South Carolina 29202.

June 10, 2015



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(803) 796-9160  
Attorney for Kay F. Paschal

**MT MOORE TAYLOR**

**RECEIVED**  
JUN 11 2015  
SC Court of Appeals

June 10, 2015

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Kay Paschal v. Leon Lott, the Duly Elected Sheriff of Richland  
County, South Carolina  
Appellate Case No. 2015-001153  
C/A No. 2012-CP-32-0342

Dear Ms. Kitching:

Enclosed for filing is our Notice of Cross Appeal in the above-referenced case.

Please be advised we have not received a copy of the Notice of Appeal and are filing this Notice of Cross Appeal out of an abundance of caution. Apparently, this case has even been given an Appellate Case Number.

We were first alerted there may have been a Notice of Appeal filed in your office by the letter of Andrew Lindemann dated June 2, 2015, which my office received June 8, 2015. In the letter, he states a Notice of Appeal was filed in this case on May 27, 2015. We have not received a copy of this Notice of Appeal or any other correspondence from the Court of Appeals or Mr. Lindemann in this matter.

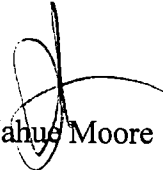
We were copied on a Notice of Appearance from Mr. Lindemann on the date he claims the Notice of Appeal was filed, but we have not received a Notice of Appeal.

In any event, please accept our Notice of Cross Appeal for filing in your office. Please also include me as the counsel of record for Ms. Paschal and forward

any correspondence to this office.

If you have any questions, please do not hesitate to call.

Yours very truly,

  
S. Jahue Moore

SJM/MBB  
Enclosure

cc: Honorable William P. Keesley  
Honorable Beth Carrigg  
Andrew F. Lindemann, Esquire