

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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.

---

**RESPONSE TO RESPONDENT'S MOTION TO DISMISS**

---

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*

As Respondent acknowledges in its Motion to Dismiss, Appellant's Initial Brief was due June 11, 2015. Appellant filed her Initial Brief on Thursday, June 11, 2015 pursuant to SCACR, Rule 262 (a) (2) by depositing it in the US mail, properly addressed to the Clerk of the Court of Appeals, with sufficient first class postage attached. Respondent filed this Motion on Monday, June 15, 2015 and thereafter confirmed to Appellant that it had received Appellant's Initial Brief in the US mail on June 16, 2015. Appellant timely filed her Initial Brief pursuant to SCACR, Rule 262 (a) (2).



Nancy Bloodgood, Esquire

Charleston, South Carolina

Date: 6-25-15

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

**RECEIVED**

Honorable Robert E. Hood, Circuit Court Judge **JUN 29 2015**

**SC Court of Appeals**

Case No. 2014-CP-40-00271

---

Kerry Paul,

Appellant,

v.

South Carolina Department of Employment and  
Workforce,

Respondent.

---

**PROOF OF SERVICE FOR APPELLANT'S RESPONSE TO  
RESPONDENT'S MOTION TO DISMISS**

---

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*

I hereby certify that on June 25, 2015 I served a copy of the Appellant's Response to Respondent's Motion to Dismiss to the following:

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

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

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

  
\_\_\_\_\_  
Nancy Bloodgood, Esquire



## FOSTER LAW FIRM, L.L.C.

*Attorneys and Counselors at Law*

PAUL J. FOSTER, JR., 1928-1999

NANCY BLOODGOOD  
nbloodgood@fosterfoster.com  
REPLY TO CHARLESTON

**RECEIVED**

JUN 29 2015

June 25, 2015

**SC Court of Appeals**

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*  
Appellate Case: 2015-000244  
Case No.: 2014-CP-40-271  
Our File No.: 11463

Dear Ms. Kitchings,

Enclosed please find the original and six copies of the Appellant's Response to Respondent's Motion to Dismiss in connection with the above-referenced matter. Please file the original and return 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 likewise providing her with 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

[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

Fost  
895 Island Park Drive, Suite 202  
Charleston, SC 29492

**First Class Mail**

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

**RECEIVED**

JUN 29 2015

SC Court of Appeals