

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2015-001078

RECEIVED

AUG 18 2015

SC Court of Appeals

Mary Ann Goldsmith Beeson

Appellant,

v.


Joseph A.C. Beeson, et al.

Respondent.

NOTICE OF REPRESENTATION

PLEASE TAKE NOTICE that David M. Collins, Jr., of the Collins Law Firm, P.C. in Greenville, South Carolina has been retained by Appellant Mary Ann Goldsmith Beeson to represent her in the above captioned matter. Mr. Collins contact information is set forth below.

August 13, 2015



David M. Collins, Jr.
P.O. Box 2465
Greenville, SC 29602
(864) 990-3061 – Phone
(864) 990-3062 – Fax
david@carolinalegalmatters.com
Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

AUG 18 2015

SC Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2015-001078

Mary Ann Goldsmith Beeson

Appellant,

v.

Joseph A.C. Beeson, et al.

Respondent.

PROOF OF SERVICE

I certify that I have served the Notice of Representation on the following individuals by depositing a copy of it in the United States Mail, postage prepaid, on August 13, 2015, addressed to the individuals as shown below:


Milford Oliver Howard, III
P.O. Box 9754
Greenville, SC 29604

Kirkman J. Moorhead
207 E. Calhoun Street
Anderson, SC 29621

David James Brousseau
P.O. Box 197
Anderson, SC 29621

James W. Logan, Jr.
1805 North Boulevard
Anderson, SC 29621

August 13, 2015


David M. Collins, Jr.
P.O. Box 2465
Greenville, SC 29602
(864) 990-3061 – Phone
(864) 990-3062 – Fax
david@carolinalegal matters.com
Attorney for Appellant

Collins Law Firm, P.C.

David M. Collins, Jr.
Stephen L. Chryst, Jr. ♦ Seth B. Mullikin

135 South Main Street, Suite 300
Greenville, SC 29601

(864) 990-3061 – Phone
(864) 990-3062 – Fax
www.carolinalegalmatters.com

Mailing Address:
Post Office Box 2465
Greenville, SC 29602

August 13, 2015

RECEIVED

AUG 18 2015

SC Court of Appeals

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

Re: Mary Anne Goldsmith Beeson v. Joseph A.C. Beeson, et al.
Civil Case No. 2014-CP-04-0474
Appellate Case No. 2015-001078

Dear Mrs. Kitchings:

Mr. Milford (Chip) Howard represented the Appellant, Mrs. Beeson, at the trial court level in this matter. Mrs. Beeson has retained me to assist with the appeal. I have enclosed a Notice of Representation together with a Proof of Service of that document for filing with your office.

I am also writing to provide you with a response about your recent letter about the requested transcript in this case.

Mr. Howard requested the transcript of the proceedings in this matter from Mrs. S. Dannette Hanks by letter dated May 12, 2015. The next day, Mrs. Beeson, the Appellant, requested the transcript by email from Renee H. Tollison. Mrs. Tollison responded with a letter requesting payment in advance for preparation of the transcript. I have enclosed copies of Mr. Howard's letter, Mrs. Beeson's email and Mrs. Tollison's letter.

Because of a miscommunication, the advance payment was not sent to Mrs. Tollison. I have received funds from Mrs. Beeson to cover the anticipated cost of the transcript together with the fee for overnight production of the transcript. In order to eliminate the otherwise necessary banking delays, I am sending the check from Mrs. Beeson for the requested amount to Mrs. Tollison today with a copy of this letter.

Assuming Mrs. Tollison can produce the transcript overnight as requested, I anticipate that we will have the transcript next week. If you need any additional information or have any questions, please let me know.

With best regards, I am

Sincerely yours,



David M. Collins, Jr.

DMC

Enclosure

cc: Renee H. Tollison
P.O. Box 4321
Anderson, SC 29622

The Honorable Rosalyn W. Frierson
South Carolina Court Administration
1220 Senate Street, Suite 201
Columbia, SC 29201

Milford Oliver Howard, III
P.O. Box 9754
Greenville, SC 29604

Kirkman J. Moorhead
207 E. Calhoun Street
Anderson, SC 29621

David James Brousseau
P.O. Box 197
Anderson, SC 29621

James W. Logan, Jr.
1805 North Boulevard
Anderson, SC 29621

Collins Law Firm, P.C.
P.O. Box 2465
Greenville, SC 29602

GREENVILLE
SC 296
14 AUG 15
PM 2 1

\$0.70⁵
US POSTAGE
FIRST-CLASS

071V00795489
29306
000003336



endicia.com/endicia.com/endicia.com

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

RECEIVED
AUG 18 2015
SC Court of Appeals

29211162929

