

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

77227
RECEIVED

SEP 11 2015
SC Court of Appeals

APPEAL FROM FLORENCE COUNTY
In the Court of Common Pleas

The Honorable Craig D. Brown, Presiding Judge

Case No. 2013-CP-21-01408

Elizabeth J. Langley.....Appellant,

v.

Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch, II, Donald Jordon, III, Jimmy White and S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch,

Of Whom Wendy J. Lynch is the Respondent.

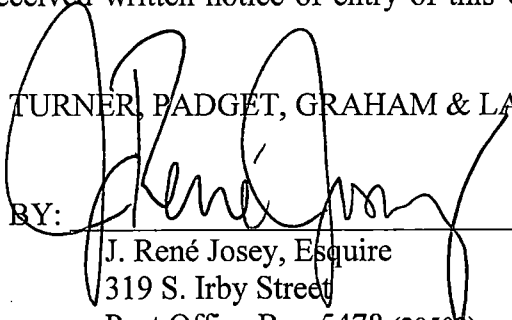
NOTICE OF APPEAL

Elizabeth J. Langley appeals the Order of The Honorable Craig D. Brown granting summary judgment dated June 22, 2015 and filed June 26, 2015. The Appellant also appeals the Order of The Honorable Craig D. Brown, denying reconsideration dated August 14, 2015 and filed August 17, 2015. Appellant received written notice of entry of this Order on August 18, 2015.

September 8th, 2015

TURNER, PADGET, GRAHAM & LANEY, P.A.

BY:



J. René Josey, Esquire
319 S. Irby Street
Post Office Box 5478 (29502)
Florence, South Carolina 29501
(843) 662-9008
(843) 667-0828 fax
Email: RJosey@turnerpadget.com
ATTORNEYS FOR APPELLANT

Other Counsel of Record:

Joseph M. McCulloch, Jr., Esquire
James Irvin, Jr., Esquire

RECEIVED

SEP 11 2015
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM FLORENCE COUNTY
In the Court of Common Pleas

The Honorable Craig D. Brown, Presiding Judge

Case No. 2013-CP-21-01408

Elizabeth J. Langley,.....Appellant,

v.

Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch, II, Donald Jordon, III, Jimmy White and
S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch,

Of Whom Wendy J. Lynch is the,.....Respondent.

PROOF OF SERVICE

I certify that I have served the *Notice of Appeal* on all counsel of record, by depositing a
copy of it in the United States Mail, postage prepaid, on September 8, 2015, addressed to:

Joseph M. McCulloch, Jr., Esquire,
Law Offices of Joseph M. McCulloch, Jr.
Post Office Box 11623
Columbia, SC 29211

Florence, South Carolina

September 8, 2015

James T. Irvin, Jr., Esquire
Irvin Law Firm, LLC
Post Office Box 2677
Myrtle Beach, SC 29578-2677

TURNER, PADGET, GRAHAM & LANEY, P. A.

By: 

J. René Josey, Esquire
319 S. Irby Street
Post Office Box 5478 (29502)
Florence, South Carolina 29501
(843) 662-9008
(843) 667-0828 fax
Email: RJosey@turnerpadget.com

ATTORNEYS FOR APPELLANT

Turner | Padget

J. RENÉ JOSEY

REPLY TO: FLORENCE OFFICE
E-MAIL: RJOSEY@TURNERPADGET.COM
WRITER'S DIRECT DIAL: (843) 656-4451
WRITER'S DIRECT FAX: (843) 413-5818

September 8, 2015

RECEIVED

SEP 11 2015

SC Court of Appeals

Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Elizabeth J. Langley v. Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch, II,
Donald Jordon, III, Jimmy White and S. Porter Stewart, II, as Personal
Representative of the Estate of James M. Lynch
Civil Action No.: 2013-CP-21-01408
TPGL File No.:

Dear Ms. Kitchings:

Enclosed for filing is the original and one (1) copy of the Notice of Appeal in the above-referenced case. Also enclosed are the following:

- (1) The original and one (1) copy of the Proof of Service of the Notice of Appeal on Respondents;
- (2) A filing fee of \$100.00; and
- (3) Pursuant to SCACR 203(d)(1)(B)(ii), I also enclose a copy of the trial court judgment and order on the summary judgment motion and motion to reconsider.

I would kindly request that you file the original documents and return filed copies to me in the enclosed self-addressed, stamped envelope provided for your convenience.

By copy of this letter to counsel for Respondent and the Clerk of the trial Court, I am simultaneously serving this Notice of Appeal and submitting it to the trial court for filing. I am also sending a copy of this Notice of Appeal to the Probate Court for filing there.

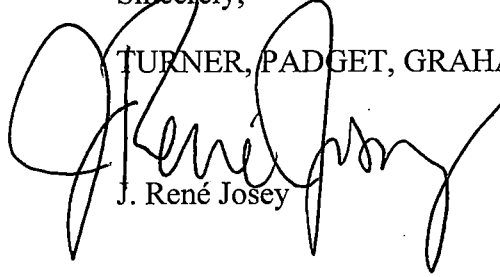
Thank you for your kind assistance in this matter.

Ms. Jenny Abbott Kitchings
September 8, 2015
Page 2

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A.

J. René Josey

A handwritten signature in black ink, appearing to read "J. René Josey", is written over the typed name. The signature is fluid and cursive, with a large initial "J" and a long, sweeping tail.

JRJ:vlb
Enclosures

Cc: Joseph M. McCulloch, Jr., Esquire (via e-mail and U.S. Mail) (w/enclosures)
James Irvin, Jr., Esquire (via e-mail and U.S. Mail) (w/enclosures)
S. Porter Stewart, II, Esquire (via e-mail and U.S. Mail) (w/enclosures)
Honorable Connie Reel-Shearin (w/enclosures for filing)
Honorable J. Munford Scott, Jr. (w/enclosures for filing)
Court Reporter Krystal J. Smith, 1509 Woods Drive, Florence, SC 29505
(with transcript order for June 17, 2015 hearing)

Turner | Padget

J. RENÉ JOSEY

RECEIVED

SEP 11 2015

SC Court of Appeals

September 8, 2015

REPLY TO: FLORENCE OFFICE
E-MAIL: RJOSEY@TURNERPADGET.COM
WRITER'S DIRECT DIAL: (843) 656-4451
WRITER'S DIRECT FAX: (843) 413-5818

Ms. Krystal J. Smith
Court Reporter
1509 Woods Drive
Florence, SC 29505

Re: Elizabeth J. Langley v. Wendy J. Lynch, Rebecca M. Lynch, James M. Lynch, II, Donald Jordon, III, Jimmy White and S. Porter Stewart, II, as Personal Representative of the Estate of James M. Lynch
Civil Action No.: 2013-CP-21-01408
Date of Hearing: June 17, 2015 – Judge Craig D. Brown
TPGL File No.: pending

Dear Ms. Smith:

I will be representing Elizabeth J. Langley in an appeal of the above-referenced matter. In that regard, I am writing to order a transcript of the June 17, 2015 hearing before Judge Brown. At your earliest convenience, please advise as to the cost of this transcription so I can order a check for your payment -- feel free to call or simply e-mail me.

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A.

J. René Josey

JRJ:vlb

Cc: Elizabeth J. Langley
Jenny Abbott Kitchings
Joseph M. McCulloch, Jr., Esquire

Turner Padget

P.O. Box 5478, Florence, SC 29502

COLUMBIA
SC 290
08 SEP '15
PM 1 L

Hasler
09/08/2015
US POSTAGE

FIRST-CLASS MAIL

\$00.70⁵



ZIP 29502
011D11647668

2.1

RECEIVED

SEP 11 2015
SC Court of Appeals

Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629