

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

SEP 21 2015

SC Court of Appeals

Honorable Clifton Newman, Circuit Court Judge

Case No. 2011-CP-23-5300

Jack R. Harrell, Jr. and Tina W. Harrell, ..... Appellants,

v.

Keowee Falls Investment Group, LLC, The Cliffs  
Communities, LLC, and S&ME, Inc. Defendants,

*Of whom*

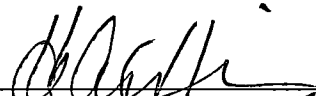
Keowee Falls Investment Group, LLC is the. .... Respondent.

**NOTICE OF APPEARANCE**

Please take note that Helen F. Hiser hereby enters her appearance as attorney for  
Respondent Keowee Falls Investment Group, LLC in this appeal.

McANGUS GOUDELOCK & COURIE, LLC

September 16, 2015



Helen F. Hiser

S.C. Bar No.: 76124

735 Johnnie Dodds Blvd., Suite 200

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

*Attorneys for Respondent Keowee Falls Investment  
Group, LLC*

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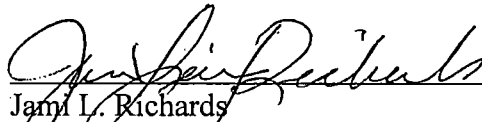
Keowee Falls Investment Group, LLC is the. .... Respondent.

**PROOF OF SERVICE**

I certify that on the 16<sup>th</sup> day of September 2015, I served the **Respondent's Notice of Appearance** on Jack R. Harrell, Jr. and Tina W. Harrell and other counsel of record by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

T.S. Stern, Jr., Esq.  
V. Elizabeth Wright, Esq.  
COVINGTON, PATRICK, HAGINS,  
STERN & LEWIS, LLC  
211 Pettigru Street  
Greenville, SC 29601

Stephanie H. Burton, Esq.  
GIBBES BURTON, LLC  
308 East Saint John Street  
Spartanburg, SC 29302



Jami L. Richards  
Legal Assistant to Helen F. Hiser  
McAngus, Goudelock & Courie LLC  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900  
*Attorneys for Respondent*

# mgc

**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

September 16, 2015

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SC Court of Appeals

**Via U.S. Mail**

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

RE: Jack R. Harrell, Jr. and Tina W. Harrell vs. Keowee Falls Investment Group, LLC, The Cliffs Communities, LLC, and S&ME, Inc.  
Civil Action No.: 2011-CP-5300  
Appellate Tracking No.: 2015-000589

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of Notice of Appearance in the above-referenced matter. I would appreciate your returning a clocked-in copy of same to me in the enclosed, self-addressed stamped envelope.

By copy of this letter, I am serving counsel of record with the above-referenced Notice of Appearance.

If you have any questions, please contact me.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

**Enclosures**

cc: T.S. Stern, Jr., Esq.  
V. Elizabeth Wright, Esq.  
Stephanie H. Burton, Esq.

*[Faint, illegible text]*

**mgc**

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The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
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