

77962

RECEIVED

NOV 24 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DARLINGTON COUNTY
COURT OF COMMON PLEAS

SPECIAL REFEREE MARTIN DRIGGERS, ESQ.

CASE NO. 10-CP-16-0454

Any heirs at law or devisees of Mary P. Pate, deceased, their heirs, et al.....Appellant

v.

GMAC Mortgage, LLC.....Respondent.

NOTICE OF APPEAL

To the Respondents, GMAC Mortgage, LLC, and their attorney, Charles S. Gwynne, Esq.:

Please take notice that the Appellant, Any heirs at law or devisees of Mary P. Pate, deceased, their heirs, et al, have filed this Notice of Appeal with the South Carolina Supreme Court, from the Order of Martin Driggers, Esq., Special Referee in the Court of Common Pleas for Darlington dated October 21, 2015, a copy of which is attached as Exhibit 1.

[SIGNATURE BLOCK ON FOLLOWING PAGES]

Respectfully submitted,

BERRY & CARR



By: Lucas M. Paulick, Attorney at Law
S.C. Bar No. 100973
Federal Bar No. 11936
1917 Lovejoy St.
Beaufort, South Carolina 29902
(843) 524-9445
(803) 785-6173 (fax)
Attorney for the Appellants

MOSS, KUHN, & FLEMING



By: James H. Moss Esq.
Moss, Kuhn, & Fleming
P.O. Drawer 507
Beaufort, SC 29901
Attorney for the Appellants

Beaufort, South Carolina
November 20, 2015

Other Counsel of Record:

Charles S. Gwynne, Esq.
Rogers, Townsend, & Thomas, PC
220 Executive Center Drive (29210)
PO Box 100200
Columbia, SC 29202-3200
Attorney for Respondents

RECEIVED

NOV 24 2015

SC Court of Appeals

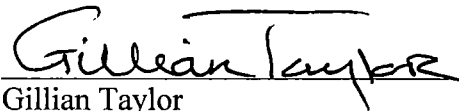
CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing

APPELLANT NOTICE OF APPEAL upon opposing counsel pursuant to Rule 5, SCRCP by placing copies of the same in the United States Mail, with postage affixed thereto and addressed as follows:

Charles S. Gwynne, Esquire
Rogers, Townsend & Thomas, PC
Post Office Box 100200
Columbia, South Carolina 29202-3200
Attorney for Respondents

MOSS, KUHN & FLEMING, P.A.



Gillian Taylor
Legal Assistant to James H. Moss, Esquire
Post Office Drawer 507
Beaufort, South Carolina 29901-0507
(843) 524-3373
Attorneys for the Plaintiff

Beaufort, South Carolina
November 20, 2015

LAW OFFICES

MOSS, KUHN & FLEMING, P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*

1501 North Street P.O. Drawer 507- Beaufort, South Carolina 29901-0507
TELEPHONE 843-524-3373
FAX 843-524-1302

KIMBERLY L. SMITH

*ALSO MEMBER OF GA BAR

November 20, 2015

RECEIVED

NOV 24 2015

SC Court of Appeals

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

RE: Any Heirs-at-Law or Devisees of Mary P. Pate, Deceased, their heirs, et al.
Appellate Case No.: 10-CP-16-0454

Dear Mrs. Kitchings:

Enclosed please find the original and three (3) copies of Appellant's Notice of Appeal regarding the above-referenced matter. I have enclosed a check in the amount of \$100.00 dollars for the filing fees and I would appreciate you clocking and filing the same with the Court and returning to me in the enclosed stamped self-addressed envelope. By copy of this letter and the enclosures I am hereby serving Respondents' Counsel with a copy of same.

Please contact my office if you have any questions or need any further information.

With kindest regards, I am

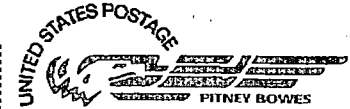
Very truly yours,

MOSS, KUHN & FLEMING, P.A.

James H. Moss, Esquire

JHM:gt
Enclosures

cc: Lucas M. Paulick, Esquire (w/enclosures)
Charles S. Gwynne, Esquire (w/enclosures)
Darlington County Court of Common Pleas (w/enclosures)



02 1R \$ 01.14⁵
0002009735 NOV 20 2015
MAILED FROM ZIP CODE 29902

MOSS, KUHN & FLEMING, P.A.
ATTORNEYS AT LAW
1501 North Street
P.O. Drawer 507
Beaufort, SC 29901-0507
(843) 524-3373

To:

GA
M-300060-15

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

RECEIVED
NOV 24 2015
SC Court of Appeals